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Initial: <u>CM Kerewan</u>

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NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY GORDON E. GUYER KERRY KAMMER O. STEWART MYERS

DAVID D. OLSON

RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCE

STEVENS T. MASON BUILDING P.O. BOX 30028 LANSING, MI 48909

DAVID F. HALES, Director

FB) E G E V E D

SEP 201989

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION

September 15, 1989

#### CERTIFIED MAIL

Mr. Charles U. Guy, Manager Environmental Compliance Corporate Risk Management Department Detrex Corporation 1100 North State Road Ashtabula, Ohio 44004

Dear Mr. Guy:

SUBJECT: Notice of Violation and Proposed Consent Order

Detrex Corporation MID 020 906 764

Enclosed please find a Notice of Violation and a proposed Consent Order. The Notice of Violation states the specific requirements of the Michigan Hazardous Waste Management Act, 1979 P.A. 64, as amended (Act 64), MCL 299.501 et seq., and the rules promulgated under this statute, which the Department of Natural Resources (Department) alleges has been violated by the Detrex Corporation. Specifically, the Department is alleging that Detrex Corporation has failed to submit a complete operating license application. The Consent Order is proposed as a means of resolving these violations.

You are offered an opportunity to confer with the staff of the Department regarding the Notice of Violation and proposed Consent Order, on September 28, 1989, at 10:30 a.m. in Conference Room A, First Floor, South Ottawa Building, Lansing, Michigan. Any documentation of compliance with the requirements specified in the Notice should be brought to the conference.

You may submit a written response to the Notice of Violation and proposed Consent Order at any time prior to, during, or in lieu of, the conference. The written response should state whether representatives of Detrex Corporation are planning to attend the conference or if the submittal is being made in lieu of the conference. If the violations alleged in the Notice of Violation are not resolved by entry of a Consent Order or otherwise by October 2, 1989, the Department may initiate proceedings to deny the operating license application and terminate Detrex Corporation's interim status.

Mr. Charles U. Guy MID 020 906 764 Page 2 September 15, 1989

This matter has been assigned to Ms. Daria Devantier, Compliance and Enforcement Section, Waste Management Division. Please contact her at 517-335-4694, if you have any questions.

Sincerely,

Alan J. Howard, Chief Waste Management Division

in A. Home

517-373-9523

#### Attachments

cc: Ms. Laura Lodisio, U.S. EPA

Ms. Marilyn Sabadaszka, U.S. EPA

Mr. Rich Traub, U.S. EPA Mr. Stewart Freeman, AG Ms. Daria Devantier, DNR

Mr. Stephen Buda, DNR/O.L. File Ms. Ronda L. Hall, DNR

Mr. Dale DeKraker, DNR-Grand Rapids

# STATE OF MICHIGAN DEPARTMENT OF NATURAL RESOURCES WASTE MANAGEMENT DIVISION

In the matter of administrative proceedings against Detrex Corporation, a corporation organized under the laws of the State of Michigan and doing business at 312 Ellsworth Avenue, S.W., City of Grand Rapids, County of Kent, Michigan 49503
EPA ID No. MID 020 906 764 -

#### NOTICE OF VIOLATION

You are hereby notified that the Staff of the Department of Natural Resources ("DNR") has sufficient information to believe that Detrex Corporation ("Detrex") has violated the requirements of the Michigan Hazardous Waste Management Act, 1979 P.A. 64, as amended, ("Act 64") MCL 299.501 et seq.; MSA 13.30 (1) et seq., and the rules promulgated thereunder.

#### Regulatory Background

- 1. Pursuant to its authority under Act 64, the DNR has promulgated administrative rules pertinent to the identification, generation, treatment, storage, disposal, and transportation of hazardous wastes in Michigan. The most recent version of these rules can be found in the Michigan Administrative Code, R 299.9101 to R 299.11107.
- 2. The U.S. Environmental Protection Agency ("U.S. EPA") first published rules concerning the identification, generation, transportation, treatment, storage, or disposal of hazardous wastes on May 19, 1980. These rules are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.
- 3. Section 3010(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of rules under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous waste subject to the rules may be transported, treated, stored, or disposed of unless the required notification has been given.
- 4. On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the U.S. EPA, pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in Michigan in lieu of the federal program, 40 CFR Part 271; 51 Federal Register 36804 (October 16, 1986). Section 3008 of RCRA, 42

U.S.C. §6928, provides that the U.S. EPA may enforce state rules in those states authorized to administer a hazardous waste program.

#### Factual Statement

- 5. Detrex is a person as defined by Section 5(2) of Act 64, and R 299.9106(g). Detrex owns and operates a facility at 312 Ellsworth Avenue, S.W., Grand Rapids, Michigan, that stores hazardous waste, (the "storage facility"). The Company is a Michigan corporation authorized to do business in Michigan.
- 6. On November 14, 1980, Detrex filed a notification of hazardous waste activity for the storage facility with U.S. EPA pursuant to Section 3010 of RCRA. The Company's EPA I.D. No. is MID 020 906 764.
  - 7. Rule 299.9502(1)(3-5) states in pertinent part:
    - "(1) A person shall not conduct, manage, maintain, or operate a treatment, storage, or disposal facility without an operating license from the director, except for those facilities identified in subrules (3), (4), and (5) of this rule . . .
    - (3) An owner or operator of a storage facility in existence on March 30, 1983, which is subject to the licensing requirements of the act solely due to the 1982 amendments to the act may continue to operate until such time as the director acts upon the facility's application for an operating license, if all of the following conditions are met:
      - (a) The facility complies with subrule 2(b) of this rule.
      - (b) The owner or operator submits a complete operating license application within 180 days after being requested to do so by the director.
      - (c) The owner or operator complies with the applicable requirements of parts 6 and 7 of these rules and all applicable environmental statutes.
    - (4) The owner or operator of a treatment, storage, or disposal facility in existence on the effective date of amendments to the act or these rules that render the facility subject to the licensing requirements of the act, may continue to operate until such time as the director acts upon the owner or operator's application for an operating license, provided the conditions of subrule (3)(a), (b) and (c) of this rule are met.
    - (5) An owner or operator of a facility in existence on January 1, 1980, which is subject to the licensing requirements of the act, but which has not yet obtained an operating license under the act, may continue to operate until such time as the director acts upon the facility's application for an operating license, if the owner or operator meets the conditions of subrule (3)(a), (b), and (c) of this rule."

#### 8. R 299.9510(1-3) states:

- "(1) Any person who requires an operating license under the act shall complete, sign, and submit, to the director, an application for each license required under R 299.9502, as described in this rule. Persons with interim status currently authorized to operate without a license as provided by R 299.9502 shall apply for operating licenses when required by the director. Procedures for applications, issuance and administration of emergency operating licenses, and research licenses are found exclusively in R 299.9501.
- (2) All applicants for operating licenses shall provide the information set forth in R 299.9508 to the director and shall use the application form provided by the director.
- (3) The director, or his or her designee, shall not begin the processing of an operating license application until it is complete, except for emergency operating licenses under R 299.9501. An application for an operating license is complete when the director receives an application which includes that information required by R 299.9508. The completeness of any application for an operating license shall be judged independently of the status of any other permit or permit application for the same facility."
- 9. On May 6, 1988, the Director of the DNR mailed an operating license call-in letter, which required the submission of a complete operating license application for the Company's Grand Rapids hazardous waste storage facility within 180 days of the date of the letter. The letter also included a description of the information required for a complete application and the citations of applicable regulations.
- 10. On November 10, 1988, the Company submitted an operating license application for the Company's Grand Rapids storage facility.
- 11. On April 18, 1989, the Chief of the WMD, mailed the Company a Notice of Deficiency/Letter of Warning (NOD/LOW) which stated that the operating license was not complete and listed the following specific deficiencies in the application:
  - a. "The operating license application form must be signed by the titleholder of land on which the facility is constructed. The signatory must be a responsible corporate officer, or a duly authorized representative, in accordance with 40 CFR §270.11. A certification statement from the titleholder of the land must also be included in the application in accordance with 40 CFR §270.11(d)."
  - b. "The operating license application must provide proof of issuance of all State environmental permits."

- c. "The operating license application must provide written proof of arrangements with the local authorities in accordance with 40 CFR §264.37."
- d. "The contingency plan must provide a physical description of all emergency equipment, and a brief outline of each item's capabilities as required by 40 CFR §264.52(e)."
- e. "The operating license application must provide the traffic information required by 40 CFR §270.14(b)(10)."
- f. "The topographic map must clearly show the legal boundaries of the hazardous waste management facility site."
- g. "The operating license application must contain a hydrogeological report that meets the requirements of R 299.9506. The facility does not meet the requirements for a waiver of the hydrogeological report as specified in R 299.9508(2)."
- "The operating license application must contain a groundwater monitoring plan in accordance with R 299.9611(2)(a). The facility does not meet the requirements for a groundwater monitoring waiver as specified in R 299.9611(3)(a). A copy of the WMD "Sampling and Analysis Plan Outline" is attached for your assistance. The facility is not in compliance with R 299.9604(1)(c) which states that owners or operators of treatment, storage, or disposal facilities shall design, construct, operate, and maintain systems to prevent hazardous waste or hazardous waste constituents from escaping into the soil, directly or indirectly into surface water or groundwaters, or uncontrolled into drains or sewers. The design of the "secondary containment" system and integrity of the basement floors and walls do not provide adequate protection against potential releases."
- i. "The failure mode assessment must address leaks or spills of hazardous waste during transport and in the loading/unloading area."
- j. "Engineering plans of the container storage unit, the loading/unloading area, and all secondary containment structures must be included in the operating license application. The plans must be prepared and sealed by a registered professional engineer and must include the information specified in R 299.9504(1)(g)."
- k. "The secondary containment system for the container storage unit does not comply with the requirements with 40 CFR §264.175."

"The containers must be directly underlain by a base that is free of cracks or gaps and is sufficiently impervious to contain leaks, spills or accumulated precipitation. The base must be sloped or otherwise designed and operated to drain and remove liquids resulting from leaks, spills or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquid. The hardwood overlain by steel plating design is not adequate. A compliance schedule for upgrading the container storage unit must be included in the operating license application in accordance with Deficiency p."

"The operating license application must provide a drawing illustrating the rows in which the containers are stored and the aisle space maintained in the storage unit."

- 1. The operating license application must address the facility design and operating standards established in R 299.9604. If an exemption from the provisions of R 299.9604(1)(a) and (b) is desired, a justified request must be provided in the application in accordance with R 299.9604(2)."
- m. "The operating license application must specify the procedures implemented to ensure that the Act 64 manifesting, recordkeeping, and reporting requirements are followed."
- n. "The operating license application must contain a certification of the storage facility's capability for managing hazardous waste. The capability certification, prepared and sealed by a registered professional engineer, must be supplemented by the certification statement provided in 40 CFR §270.11(d) in accordance with 40 CFR §270.11(b)."
- o. "The Michigan financial test form or an alternate Michigan approved mechanism must be used to demonstrate financial assurance for closure/post-closure care and liability coverage. The federal form submitted with the operating license application is not adequate. A Michigan form is enclosed for your use."
- p. "The operating license application must provide a detailed description of the modifications necessary to bring the facility under compliance. The container storage secondary containment design must be upgraded in accordance with Deficiency j."
- 12. The NOD/LOW advised the Company that submission of an incomplete operating license application was a violation of Act 64 and Rule 299.9502(3)(b), and that failure to submit the deficient information by May 19, 1989, could subject the Company to civil fines pursuant to Section 48 of Act 64, termination of interim status and denial of the Company's operating license application.

- 13. On April 24, 1989, the Company submitted a request for an extension of the revised operating license application submittal deadline from May 19, 1989, to June 19, 1989. On April 27, 1989, the Chief of the Hazardous Waste Permits Section, Waste Management Division, mailed the Company a letter approving the request.
- 14. The following information required was not received on or before June 19, 1989:
  - a. An operating license application form signed by the titleholder of the land upon which the facility is located;
  - A certification statement by the titleholder of the land upon which the facility is located;
  - c. A financial assurance document that meets the requirements of R 299.9703;
  - d. A liability coverage document that meets the requirements of R 299.9710.

#### Conclusion

The DNR has sufficient information to believe Detrex has violated Act 64 and the rules promulgated thereunder. A person who violates Act 64 or the rules promulgated thereunder is subject to state or federal civil and criminal sanctions. Accordingly, a failure on the part of Detrex to timely and adequately respond to the violations cited herein may result in the commencement of administrative or judicial proceedings against the Company, termination of interim status, and denial of the operating license application.

Alan J. Howard, Chief Waste Management Division 517-373-9523

Dated: 9-15-89

# STATE OF MICHIGAN DEPARTMENT OF NATURAL RESOURCES WASTE MANAGEMENT DIVISION

In the matter of administrative proceedings against Detrex Corporation a corporation organized under the laws of the State of Michigan and doing business at 312 Ellsworth Avenue, S.W., City of Grand Rapids, County of Kent, State of Michigan 49503 EPA I.D. No. MID 020 906 764-

MMD	Order	Nο.	

#### CONSENT ORDER

#### RE: INCOMPLETE OPERATING LICENSE APPLICATION

This proceeding results from allegations specified in a Notice of Violation (NOV) issued on September 15, 1989, by the Staff of the Department of Natural Resources ("DNR"). The DNR alleges that Detrex Corporation ("Detrex"), a Michigan corporation, doing business at 312 Ellsworth Avenue, S.W., City of Grand Rapids, County of Kent, Michigan, is in violation of the Michigan Hazardous Waste Management Act, 1979 P.A. 64, as amended ("Act 64"), MCL 299.501, et seq.; MSA 13.30(1) et seq., and rules promulgated thereunder. Detrex and the DNR agree to resolve the violations set forth in the NOV in this matter and to terminate this proceeding by entry of this Consent Order.

#### I. <u>STIPULATIONS</u>

Detrex and the DNR stipulate as follows:

- 1. Pursuant to its authority under Act 64, the DNR has promulgated administrative rules pertinent to the identification, generation, treatment, storage, disposal, and transportation of hazardous wastes in Michigan. These rules are set forth in the Michigan Administrative Code, R 299.9101 to R 299.11107.
- 2. On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the U.S. Environmental Protection Agency ("U.S. EPA"), pursuant to Section 3006(b), the Resource Conservation and Recovery Act ("RCRA") 42 U.S.C. §6926(b), to administer a hazardous waste program in Michigan in lieu of the federal program, 40 CFR Part 271, 51 Federal Register 36804 (October 16, 1986). Section 3008 of RCRA, 42 U.S.C. §6928, provides that the U.S. EPA may enforce state regulations in those states authorized to administer a hazardous waste program.

- 3. Detrex is a person as defined by Section 5(2) of Act 64 and R 299.9106(g). Detrex owns and operates a facility at 312 Ellsworth Avenue, S.W., Grand Rapids, Michigan, that stores hazardous waste (the "storage facility"). Detrex is a Michigan corporation authorized to do business in Michigan.
- 4. On November 14, 1980, Detrex filed a notification of hazardous waste activity for the storage facility with U.S. EPA pursuant to Section 3010 of RCRA. Detrex's EPA I.D. No. is MID 020 906 764.
- 5. The Director of the DNR is authorized by Section 48(1) of Act 64, to issue orders to comply. Accordingly, the Director has authority to issue and enter into this Order to comply by consent with Detrex.
- 6. Detrex stipulates to the issuance and entry of this Order to comply by consent and stipulates that the termination of this matter by a final order to be entered as a Consent Order is proper and acceptable. This Consent Order, thus, shall be considered a final order of the DNR and shall become effective on the date it is signed by its Director.
- 7. Detrex and the DNR agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by Detrex that the law has been violated.

#### II. COMPLIANCE PROGRAM

- 8. Detrex shall complete the operating license application as required by Act 64 and its rules, in accordance with the following schedule:
  - A. By November 1, 1989, Detrex shall submit an operating license application form signed by the titleholder of the land upon which the facility is located. The form shall be accompanied by proof that the signatory is the actual titleholder.
  - B. By November 1, 1989, Detrex shall submit the certification statement required by R 299.9508(3) and 40 CFR §270.11 and signed by the titleholder of the land upon which the facility is located.
  - C. By November 1, 1989, Detrex shall submit a financial assurance document that meets the requirements of R 299.9703.
  - D. By November 1, 1989, Detrex shall submit a liability coverage document that meets the requirements of R 299.9710.

E. For purposes of this order, the words "owner" and/or "titleholder" means all persons who hold a legal, equitable, or possessory interest of any kind in the property upon which the facility is located, including, but not limited to, a trust, vendor, vendee, lessor, or lessee. "Person" means an individual, partnership, joint venture, trust, firm, joint stock company, corporation, association, or any other legal entity.

#### III. FINES AND PENALTIES

- 9. Within 30 days of entry of this Order, Detrex shall pay to the General Fund of the State of Michigan, by check made payable to the State of Michigan and delivered to the Assistant Attorney General in Charge, Environmental Protection Division, Law Building, 525 W. Ottawa, Lansing, Michigan 48913, a civil fine in the sum of \$3,000.00. This sum is in addition to any fees, taxes, or other fines that may be imposed on Detrex by law.
- 10. For each failure to comply with any deadline specified in subparagraphs A to D of paragraph 8, Detrex shall pay \$500 per violation per day for one to seven days of delay, \$1,000 per violation per day for eight to fourteen days of delay, and \$2,500 per violation per day for each day of delay or part thereafter. Stipulated penalties shall be paid within thirty (30) days after written demand made by the DNR by check made payable to the State of Michigan and delivered to the Assistant Attorney General in Charge, Environmental Protection Division. Notwithstanding the assessment of any stipulated penalties, the DNR may initiate proceedings to deny Detrex's operating license and terminate Detrex's interim status for failure to meet the applicable deadlines specified in Section II above.
- 11. Detrex agrees not to contest the legality of the civil fine paid pursuant to paragraph 9 above. Detrex further agrees not to contest the legality of any stipulated penalties assessed pursuant to paragraph 10 above, but reserves the right to dispute the factual basis upon which a demand by DNR for stipulated penalties is made in a court of competent jurisdiction.

#### IV. GENERAL PROVISIONS

- 12. DNR reserves the right to pursue any other remedies to which they are entitled for any failure on the part of Detrex to comply with the requirements of Act 64, and its rules.
- 13. Notwithstanding any other provision of this Consent Order, an enforcement action may be brought by DNR pursuant to Act 64 or other statutory authority where the generation, storage, transportation, treatment, or disposal of hazardous waste at the Grand Rapids facility may present an imminent and substantial hazard to the health of persons or to the natural resources or is endangering or causing damage to the public health or the environment.

- 14. The DNR and Detrex consent to enforcement of this Order in the same manner and by the same procedures for all final orders entered pursuant to Act 64, MCL 299.501; MSA 13.30(1), and enforcement pursuant to 1970 P.A. 127, MCL 691.1201 et  $\underline{seq}$ ; MSA 14.528(201) et  $\underline{seq}$ .
- 15. This Order in no way affects Detrex's responsibility to comply with any other applicable state, federal, or local laws or regulations.
- 16. The provisions of this Order shall apply to and be binding upon the parties to this action, their officers, directors, agents, servants, employees, successors and assigns, and all persons, firms and corporations having notice of the Order. Detrex shall give notice of this Order to any prospective successor in interest prior to transfer of ownership and shall notify the DNR of such proposed sale or transfer.

#### V. TERMINATION

17. This Order shall terminate upon written confirmation by the Chief of the Waste Management Division that the operating license is administratively complete.

#### SIGNATORIES

The undersigned CERTIFY they are fully authorized by the party they represent to enter into this Order to comply by consent and to EXECUTE and LEGALLY BIND that party to it.

DEPARTMENT OF NATURAL RESOURCES By: Title: Title: Director Date: Date: DEPARTMENT OF ATTORNEY GENERAL Frank J. Kelley Attorney General Stewart H. Freeman Assistant Attorney General In Charge Environmental Protection Division 720 Law Building Lansing, Michigan 48913 Date:

NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY KERRY KAMMER O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

David F. Hales, Director State Office Building 350 Ottawa, N.W. Grand Rapids, MI 49503 Phone: 616-456-5071

June 14, 1988

Ms. Sharon Burns
Gold Shield Solvents
312 Ellsworth, S.W.
Grand Rapids, MI 49503

RE: MID 020906764

Dear Ms. Burns:

On June 13, 1988, staff of the Department of Natural Resources conducted an investigation of your facility located at 312 Ellsworth, Grand Rapids, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and with Michigan Act 64, P.A. of 1979. A copy of the completed inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA and Act 64. Specifically, staff found that the following requirement(s) were not being met:

1. An annual review of personnel training had not been conducted as required by 40 CFR, Part 265.16 of RCRA.

We request that you respond to this letter by June 22, 1988, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to July 13, 1988. The DNR will evaluate your response and determine our facility's compliance status.

If you have any questions, feel free to contact me and address your response to the address on this letter.

Sincerely,

Dale M. DeKraker

Environmental Quality Analyst Waste Management Division

De Dekraber

DMD/bls

Enclosure



NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY GORDON E. GUYER KERRY KAMMER
O. STEWART MYERS

RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 616-456-5071 July 14, 1986

Ms. Sharon Burns Detrex Chemical Industries Gold Shield Solvent Division 312 Ellsworth, S. W. Grand Rapids, MI 49503

RE: MID 020906764

Dear Ms. Burns:

On July 11, 1986, staff of the Department of Natural Resources conducted an investigation as an agent of U.S. EPA of your facility located at 312 Ellsworth, Grand Rapids, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that the following requirement was not being met:

A copy of Manifest #MI0823982 dated February 20, 1986, has not been received from the disposal facility within 45 days of shipment and your company has not initiated follow-up activity nor notified EPA as required by 40 CFR, Part 262.42 of RCRA.

We request that you respond to this letter by July 25, 1986, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to August 10, 1986. The DNR will evaluate your response and forward a copy of the response to the U.S. EPA along with a recommendation on your facility's compliance status.

If you have any questions, feel free to contact me and address your response to the address on this letter.

Sincerely,

Dale M. DeKraker

Environmental Quality Analyst

Hazardous Waste Division

Dow DeKuker

cc: M. Murphy, U.S. EPA, Region V (w/enc.) Enclosure



JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 October 25, 1985

Mr. W. G. Robrecht Detrex Chemical Industries, Inc. P. O. Box 501 Detroit, MI 48232

RE: MID 020906764

NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON E. R. CAROLLO

MARLENE J. FLUHARTY STEPHEN F. MONSMA

O. STEWART MYERS RAYMOND POUPORE

HARRY H. WHITELEY

Dear Mr. Robrecht:

This correspondence is written to acknowledge receipt of your letter dated October 21, 1985, which itemizes actions taken by the company to correct deficiencies noted during the RCRA inspection on October 4, 1985.

Therefore, this is to notify you that at this time the company has corrected the violation(s) identified in the compliance letter of October 9, 1985, with regard to the Resource Conservation and Recovery Act.

Sincerely,

Dale M. DeKraker

Water Quality Specialist Hazardous Waste Division

DMD/mn

cc: M. Murphy, U.S. EPA Region V
Jim Harrison
Gold Shield Solvents

312 Ellsworth, SW Grand Rapids, MI 49503

# DETREX CHEMICAL INDUSTRIES, INC.



P.O. BOX 501, DETROIT, MICHIGAN 48232

TWX 810-224-4756

TELEPHONE (313)358-5800

October 21, 1985

HECEIVED

OCT 2 1985

TATA TRAILE WASTE DIMEIN

Mr. Ronald C. Waybrant District Supervisor Hazardous Waste Division Michigan DNR State Office Building 350 Ottawa, N.W. Grand Rapids, MI 49503

Re: MID 020906764

Your Letter to J. Harrison & Mike Tepatti 10/9/85

Dear Mr. Waybrant:

We regret that a copy of our latest Closure Cost Estimate was not available at the site during the inspection of October 4, 1985.

Our closure cost estimates are routinely updated in January for all of our facilities in preparation for submittal of our annual RCRA financial data.

Enclosed is a copy of the most recent Closure Cost Estimate, dated 1/3/85, for the Grand Rapids facility.

Should you need any additional information, please advise.

Very truly yours,

W. G. Robrecht

Manager of Corporate Engineering

/smb

Encl.

cc: J. Harrison

M. Tepatti

X6 EPA - REGION I MARY MURPHY

### RCRA Inspection Report

¿PA	Identification Number: M I D	. 0	2	0900	076	4	
(90)	GOLD SHIEL	10 S.Or	ver	DUSTRIES DIVISIO	o N	*	
Loca	tion Address: 312 ELLS	WORTH					
City	: GRAND RAPIDS	State:	0	ICHIGAN			
Date	of inspection: 10485	Time of	insp	pection (from)	9:30AM	(to) //200/	3M
Pers	on(s) interviewed	Title			Tel ephon	e	
M	- Jim HARRISON	BRANC	H	MANAGER	454	-9269(	611
2	MIRE TEPATTI	1	-	η	454	-92696	16
-			u international in the second		Cushing deviate the Desire State Character state		
I isp	ector(s) HE DE KRAKER	Agency/1	fitle +164	PN-ONR	Tel ephor	ne 5071 (616)	_
		**************************************			-		eritech wage
Inst	allation Activity (mark only one	box)			Inspecti	ion Form(s)	
X	Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265	.1 a	nd/or		A	2
II	Treatment/Storage/Disposal (no ge	neration	or	Transportation	)	A	
II	Generation and Transportation					B, C	
П	Generation only					В	
TT	Transportation only					С	

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# Reproduced by the Statuof Michigan

#### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit applic	catio	n process(es) (EPA Form 3510-3) Inspection	ו Form .	A section(s)
102	IXI	storage in containers		
\$02	X	storage in tanks	(	(J)
TOT		treatment in tanks		J
\$04	II	storage in surface impoundment		K,F
702		treatment in surface impoundment		K,F
D83		disposal in surface impoundment		K,F
\$03		storage in waste pile		L
D81		disposal by land application		M,F
D80		disposal in landfill		N,F
Т03		treatment by incineration		0/P
T04		treatment in devices other than tanks, sur impoundments, or incinerators	face	Q
Other activities				
GENERATOR	M	APP	ENDIX	(GN)
TRANSPORTER	M	APP	ENDIX (	TR

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

NONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

TOY CODE IS NOT APPLICABLE

		Section B: GEN	ERAL FACILIT	TY STAN	<u>IDARDS</u> :	(Part	265 Subpart B)
				YES	NO	NI*	Remarks
1.		he Regional Administrat notified regarding: 26!			i		
		eceipt of hazardous aste from a foreign sou	rce?	óvnekkötta Milliadekött	edoj-alkovenegaris		NA
	b. F	acility expansion?		Water Challenger Control	NO PROSESSIFICATION AND ADDRESS	Barren Comment	NO EXPANSIONS
	c. C	hange of owner or opera	itor?	000°0040000 0000	elastenenas-pa	E-market and	NO GHANGES
2.	Gener	al Waste Analysis: 265	.13				1
	a	as the owner or operato detailed chemical and nalysis of the waste?		<u>l</u>	YYUURAAIDALA	бу-емитоболито	CPECIFIC GRAVIM .
	а	oes the owner or operat detailed waste analysi n file at the facility?	is plan		ev-communica	who one opposite the state of t	BASIC BUT ADAQUATE
	S â	oes the waste analysis pecify procedures for indicate analysis of each moving azardous waste from off	inspection vement of	<u></u>	de de de l'annual de martin,		*
3.	Secur	ity - Do security measu (if applicable) 265.		:			
	a. 2	24-Hour surveillance?			Treasury of the	Merchanton-and	ONE SHIFT OFFRATION
		or  Artificial or natura  barrier around facil  and  Controlled entry?					LOUISED AT NIGHT
	c. [	Danger sign(s) at entrance?		<u>-</u> /	The Control of Control	PORMERONIA SEASON	
4.	0wne:	r or operator inspectio	ns: 265.15				
	1	Does the owner or opera inspect the facility fo malfunctions, deteriora operator errors, and di of hazardous waste that may affect human health the environment?	r tion, schanges	<u></u>	***************************************		

5.

			YES NO	NI	Remarks
ę.	have	s the owner or operator e an inspection schedule the facility?	E.	· .	
(		so, does the schedule address inspection of the following ms:			
	g. 6	monitoring equipment?	CONTROL LANGE	E.	NA
	ii.	safety and emergency equipment?	B. Carrent Control	and the state of t	
	iii.	security devices?		(100) Sala SALUSSIA and Ulana and	
	î۷.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	2	The Edular Commence	Constitution of the consti
	V.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>/</u>		
	Vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	Santa American	3360 <b>8</b> 45,064-844-44	
(		areas subject to spills inspect- daily when in use?		\$	
	an :	s the owner or operator maintain inspection log or summary of er or operator inspections?	<u> </u>		
		s the inspection log contain the lowing information:			
	i.	the date and time of the inspection?	12-4	/	NO TIMES
	ji.	the name of the inspector?	and the second	najsto <del>aprillativo della messa messa</del>	
	, <u>, , ,</u>	a notation of the observations made?	1	nate — — — — — — — — — — — — — — — — — — —	
	iv.	the date and nature of any repairs or remedial actions?			
Do perminclud		training records 55.16			
	a. Job	titles?	Lund _	nder nder net	
	b. Job	descriptions?	L.		

			152	NO	Ni	Kemarks
	C.	Description of training?	<u> </u>	четимический в т		TRAINEN IN CONTINEARY
	d.	Records of training?	L	e/A5E/D4De/2-D		PAN .
	е.	Did facility personnel receive the required training by 5-19-81?	<del> </del>	A Company of the Comp	Б.Уо-месочиналию	
	∱.	Do new personnel receive required training within six months?	g de la company	- COMMERCIAL AND A STATE OF THE ADMINISTRAL AND A STATE OF THE	M <sup>arg</sup> ininah Marija	
	9.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	. Burnananan			9/9/85
6.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7		Allan Control (Allan Control)	The second secon
	a.	Special handling?		halotoleta attacheria	book	WASTES ARE NOT
	b.	No smoking signs?	***************************************	4-Blownson	-4	16NITABLE OR REACTIVE.
	C.	Separation and protection from ignition sources?	0.000+11	- TO LOCAL TRANSPORT		-

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1.	Maintenance and Operation of Facility: 265.31	YES NO	NI	Doma who
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	123 110	117	Remarks
2.	If required, does the facility have the following equipment: 265.32			
	a. Internal communications or alarm systems?	<u> </u>	*tamac/*	TO LESCONY
	b. Telephone or 2-way radios at the scene of operations?	<u> </u>		
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u> </u>		
	Indicate the volume of water and/or fo	am available	for fi	re control:
	CIT WATER		OPPOPULATION OF THE PROPERTY AND PROPERTY AN	
3.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u>V</u>		CONTRACTED OUT ON A GUARTERN BASIS
	b. Is emergency equipment maintained in operable condition?	<u> </u>		A QUARTERINA 1007010
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	<u> </u>		
5.	Is there adequate aisle space for unobstructed movement?	in the second	Same Constitution (Same	
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<u> </u>	<del></del>	PIRE ONR POYCE
		C-1		1/82 A

		Section D: CONTINGENCY PLAN AND	EMERG	ENCY	PROCEDU	JRES: (Part )	265 Subpart D)	
			YES	ОИ	NI	Remarks		
}.		the Contingency Plan contain the wing information: 265.52			·			
	t u w P m o i m s r	he actions facility personnel ust take to comply with 265.51 and 265.56 in response of fires, explosions, or any uplanned release of hazardous aste? (If the owner has a Spill revention, Control, and Countereasures (SPCC) Plan, he needs used that plan to uncorporate hazardous waste anagement provisions that are ufficient to comply with the equirements of this Part (as pplicable.)	<u>~</u>		ментин		O BE MORE	
٠.	p h a t	rrangements agreed by local olice departments, fire departments ospitals, contractors, and State nd local emergency response teams o coordinate emergency services ursuant to §265.37?	V		<del>an</del> ga 4450	PETALLED		
	n p	ames, addresses, and phone umbers (office and home) of all ersons qualified to act as mergency coordinators?	<u></u>	Nimed Shirtness you in program of the	**************************************			NAI APPEILA / E
	a 1 0	list of all emergency equipment the facility which includes the ocation and physical description f each item on the list and a rief outline of its capabilities?	<u>v</u>		**************************************			
	s i s s t	n evacuation plan for facility per- onnel where there is a possibil- ty that evacuation could be neces- ary? (This plan must describe ignal(s) to be used to begin evacua- ion, evacuation routes, and alternate vacuation routes?)		Maria de Ma	V	NOT PLE	DUMAD	WAX-
2.	avail	opies of the Contingency Plan able at the site and local ency organizations? 265.53	gg. range	all production of the second o	- publication of the			

			TES NO	N1	Remarks
3.	Eme	rgency Coordinator 265.55	•		
	3∙	Is the facility Emergency Coordinator identified?		STEP-NO. A STATE Advances	Mr HARRISON
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?		4954Mahananya	
	C •	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		esse Manus mac rep	
4.	Eme	rgency Procedures 265.56			
	at . Coo	an emergency situation has occurred this facility, has the Emergency rdinator followed the emergency cedures listed in 265.56?	Ministration Banquegagagag	<u>V</u>	NONE HAS OCCUMED

			<u>S</u>	ection E:	MANIFEST SYS	TEM, RECOF	RDKEE	PING,	AND R	EPORTING: (Part 265 Subpart E)	
							YES	ИО	NI	Remarks	
古古	١.	Use	of M	anifest Sy	stem 265.71						
		ã.	proc proc (Par the gene	edures lis essing eac ticularly signed man	ity follow the ted in §265.7 h manifest? sending a cop ifest back to in 30 days af	l for y of the		<u>,</u>			-
		b.		records of ined for 3	past shipmen years?	ts	\$ . order	/ ——	del Aliques (VIII)		
女女	2.	req	uirem		operator meet ding manifest 265.72		- many	errannan ar	ETP-ADP-460TUTNEED	RETURNED TO	
**	0.7	on-s	ite f	acilities	rs or operato that do not off-site sou					GENERATUR-	
	3.	0pe	ratin	g Record	265.73						
		a.	mair	ntain an op ord as requ			<u> </u>	/ 	<b>Walked Schemology</b>	-	_
		Ь.	cont	the opera ain the formation:	ating record ollowing					•	
			i .	of each wastorage, o	d(s) and date( aste's treatme or disposal as in 40 CFR Part !?	ent,				DRUMS	
			11.	each hazar facility? should be to specif	ion and quanti rdous waste wi (This inform cross-referer ic manifest nu was accompanie fest.)	thin the nation need maker,		W-SECONOMIC	Section of the		
		***	ii.		diagram of eac isposal area	ch					
		***		- applies t lities	o disposal		Ę	1		4/82-A	

showing the location and
quantity of each hazardous
waste? (This information
should be cross-referenced
to specific manifest
number, if waste was
accompanied by a manifest.)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
  - v. Reports detailing all incidents that required implementation of the Contingency Plan?
- vi. All closure and post closure costs as applicable?
- 41 Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

- 5.\*\*Unmanifested Waste Reports 265.76
  - a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
  - b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

Comment	ammer 40 <del>5</del>	0000000 AVA-2000-	
E was	amment 404	00 man 178 cm	

<u>стан</u>	V	NA
<i></i>		

 /		
	-	



<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

		Section G ~_ LOSURE AND PO	ST CLOSURE	(Part .	.5 Subpart G)
			YES NO	NI	Remarks
	pla	265.112 the facility closure n available for inspection? s the plan identify:	<u> </u>	**************************************	NEEDS TO BE UPDATED FOR 1985.
	i.	maximum extent unclosed dur- ing facility life?	1	there were an administration of	NO FARTUR CLOSURES
	ii.	maximum hazardous waste in- ventory?		NEEDS TO THE PERSON AS A SECURITY OF	
	iv.	estimated year of closure?	Branches v. Branch	Abelliggi am <sub>AUSP</sub>	<u>20094-D</u>
	٧.	schedule of closure activities?	Land Comment	<del></del>	
	c. Has	closure begun?	-Min kindunggiya Silikikida kindung	Miller Miller or	
*	Post-C1	osure 265.118			
	a. Is for	the post-closure plan available inspection?	WARREN STATE	**************************************	
	b. Doe	s this plan contain:			·
	i.	description of groundwater monitoring activities and frequencies?		Philips-gamaki.	
	ii.	description of maintenance activities and frequencies for			
		AA. integrity of cap, final cover, or containment structures, where applicable		VP-17Ein-Million San	,
		BB. facility monitoring equip- ment			
	iii.	name, address, and phone number of person or office to contact during post-closure care period?	######################################	MARKET MANDER	
	c. Has	the post-closure period begun?	STANDARD STA	Miles and the second	
	d. Is est	the written post-closure cost imate available? 265.144	ayaqqqqqqamaqqq	ESSENT imm specifyrgy.	

## Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I) YES NO NI Remarks 1. Are containers in good condition? 265.171 2. Are containers compatible with waste in them? 265.172 Are containers managed to prevent leaks? 265.173 Are containers stored closed? 5. Are containers inspected weekly for leaks and defects. 6. Are ignitable and reactive wastes stored 265.776 at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177

E. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

# Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

7.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	<u> </u>	Manadagha at Mighigh Spilaces		LTANK - STILL
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	V_		CON	TAILLED AND 2
3.	Do continuous feed systems have a waste-feed cutoff?	different States	1	BAR	H
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193		-Ľ	ALWAYS THE SAME
٤,	Are required daily and weekly inspections done? 265.194		W-GAM-ANDROPPIN	***************************************	
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable?  Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.198	en auss en rendra	$\underline{V}$	· · · · · · · · · · · · · · · · · · ·
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	WindShielden	erratumentalistissa .	V	NA
8.	Has the owner or operator observed buffer zone requirements for tanks				
	Tank capacity:gallons				
	Tank diameter:feet				
	Distance of tank from property 1	ine			feet
	(See table 2 - 1 through 2 - 6 o	f NFPA's "F	lammab	le and	Combustible Liquids

Section A: Scope

1.	Complete this Appendix if the owner or operator of a TSD facility also generates
	hazardous waste that is subsequently shipped off-site for treatment, storage,
	or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)	Section B:	MANIFEST	REQUIREMENTS	(Part	262.	Subpart	В	1
--	------------	----------	--------------	-------	------	---------	---	---

Sect	ion B	: MANIFEST REQUIREMENTS (Part 262, Subpart	yES	NO	NI	Remarks
(1)		the operator have copies of the manifest lable for review? 262.40				
(2)	mont	nine manifests for shipments in past 6 ths. Indicate approximate number of fested shipments during that period.	novinskom kasta 4000			
(3)	foll cop fest	the manifest forms examined contain the owing information: (If possible, make ies of, or record information from, manicity) that do not contain the critical ments). 262.21				
	ð.	Manifest document number?	<u> </u>	e de la companya del companya de la companya del companya de la co		
	þ.	Name, mailing address, telephone number, and EPA ID number of Generator		g of managements	₹	
	с.	Name and EPA ID Number of Transporter(s)?		,	distant the entire of	VAUFT CITT REFUSE
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	V	, or		PETRO CHEM.
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	Limited	·	n <del></del>	GOLD SHIELD  ORM-A
	۴.	The total quantity of waste(s) and the type and number of containers loaded?	J. January	in part	may before in the second second	BULK
	g.	Required certification?	1	,	gs shill Committabilision	
	h.	Required signatures?	le			
(4)	Rep	portable exceptions 262.42				

a.	For manifests examined in (2) (except for shipments within the last 35	days),
	enter the number of manifests for which the generator has NOT received	a
	signed copy from the designated facility within 35 days of the date of	ship-
	ment	

	tor.					
	has submitte	d exception	reports (40 )	CFR 262.42)	to the Regi	onal Administra-
b.	For manifest	s indicated	in (4a), ent	er the numb	er for which	the generator

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

facility?

## YES NO NI Remarks Section A: SCOPE: Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10. Does the transporter transport hazardous waste into the U.S. from abroad? Does the transporter transport hazardous waste out from the U.S.? Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B) Are copies of completed manifests available for review and retained for three years. 263.22 2. Estimate the number of manifests for shipments completed during the part 6 months. 180 Examine a representative number of manifests. Indicate number examined. 240 4. Did transporter properly sign and date the manifests examined? Do any manifests indicate shipments delivered to other than the designated facility? 263.21 If (5) is "no," skip 6 and 7. Do any manifests indicate shipments delivered to other than an alternate facility? 7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated



NATURAL RESOURCES COMMISSION
HOMAS J. ANDERSON
R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE

HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 October 9, 1985

Mr. James Harrison Mr. Mike Tepatti Gold Shield Solvents 312 Ellsworth, S. W. Grand Rapids, MI 49503

RE: MID 020906764

Dear Mr. Harrison and Mr. Teppatti:

On October 4, 1985, staff of the Department of Natural Resources conducted an investigation as an agent of U. S. EPA of your facility located at 312 Ellsworth, Grand Rapids, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that the following requirement was not being met:

1) The company's closure cost estimate has not been subject to annual update as required by 40 CFR, Part 265, Subpart H.

We request that you respond to this letter by October 18, 1985, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to November 1, 1985. The DNR will evaluate your response and forward a copy of the response to the U.S. EPA along with a recommendation on your facility's compliance status.

If you have any questions, feel free to contact Dale DeKraker and address your response to the address on this letter.

Sincerely,

Ronald C. Waybrant, Ph. D.

District Supervisor

Hazardous Waste Division

RCW/DMD/mn

RCW/DMD/mn

RCW/DMD/mn

RCW/DMD/mn

RCW/DMD/mn

# RCRA Inspection Report

FA	Identification Number: A T C	<u> </u>	alimen washington with the contraction of the contr
i ast	callation Name: News City	COLUMN CHUNCH	aturat o ministrato totro
(008	ation Address: <u>SIF GALSINO</u>	• • • •	95-annoanceadra - 4000-000-400
City	1: GRASIN RAPINS	State: MKNILL	nanahartian-uji nenganjanik jadyakai
Date	e of inspection: $7-14-86$	Time of inspection (from)	836/10 (to) 11:15/71
Pers	son(s) interviewed	Title	Tel ephone
11/1	SUARON BARAS	SECRETARY	616-454-9261
ALTERNATION OF THE PARTY OF THE		dates yangayan mada dibana datah samaniga sahi dadah dibah dibah di Palatidah di Arpetin di Marie da Palatidah	
	pector(s)	Agency/Title	Tel ephone 6-16 - 456 - 3071
Ins	tallation Activity (mark only one	box)	Inspection Form(s)
K	Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265.1 and/or	a
	Treatment/Storage/Disposal (no ge	neration or Transportation)	A
	Generation and Transportation		B, C
II	Generation only		В
II	Transportation only		С

#### INSPECTION FORM A

#### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit applica	tio	n process(es) (EPA Form 3510-3)	Inspect	on Form	A section(s)
501 <u>T</u>	XI	storage in containers			I
S02 <u>T</u>	XÍ	storage in tanks			Ĵ
тоі І	I	treatment in tanks			J
S04 <u>I</u>	I	storage in surface impoundment			K,F
T02 <u>T</u>		treatment in surface impoundment			K,F
D83 <u>T</u>		disposal in surface impoundment			K,F
s03 <u>T</u>		storage in waste pile			L
D81 _	I	disposal by land application.			M,F
D80 I		disposal in landfill	•	п	N,F
. тоз Т	Ī	treatment by incineration			0/P
, T04 <u>T</u>	<u> </u>	treatment in devices other than t impoundments, or incinerators	anks, si	ırface	Q
Other activities					•
GENERATOR 📡	I		AP	YEWIX	GN
TRANSPORTER 📝	4		AP	XICMEN	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process come and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

704 18 EXECUT

		Section B: GENERAL FACILI	TY STAP	YDARDS:	(Part	265 Subpart B)
		>	YES	NO	NI*	Remarks
		the Regional Administrator notified regarding: 265.12				
		Receipt of hazardous waste from a foreign source?	meen Schooling St.	elicone quenyojiq.	L. war	NA
	Ž.	Facility expansion?	<b>Godonýme</b> pegy	and (my laineach).	Company and	NA
		Change of owner or operator?	described of the state of the s	<del>бекілінденсенн</del> ду.	L	<u> </u>
4	,en	eral Waste Analysis: 265.13				,
	.1.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?		<b>CELEDO motormalio</b>	Golineandonne, .	3951 DATALYSIS FOR
	þ.	Does the owner or operator have a detailed waste analysis plan on file at the facility?		<b>t</b> elestinosoma	maning supremga	Ansil as not sone
	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	3	***************************************	- And	CAGO VIEW SEE
3.	Sec	urity - Do security measures include (if applicable) 265.14	<b>;</b> :			
	ā.	24-Hour surveillance?	elilli derdina di	60-Common-Cattle	C. Market	ONE SHIPE CITETION
	b.	or i. Artificial or natural barrier around facility?	- Re-		manuscopies (CEC)	Equality of a posterior during
		and ii. Controlled entry?	- Berton	<b></b>	<del>december 200</del> 0	CAT-HOUSE
	Ċ.	Danger sign(s) at entrance?			ee-e-e-e-e-e-e-e-e-e-e-e-e-e-e-e	Security Date
4.	0wn	ner or operator inspections: 265.15				
	<b>a</b> .	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	./			
		CHE CHALLOURHELLE:		-		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

		YES	NO	NI	Remarks
	b. Does the owner or operator have an inspection schedule at the facility?	<u> </u>	gge <sup>gg</sup> .	9 GZÁria-saibr-sársum	enn nære grændje-forske kildinassen som de <sub>en li</sub> g de fredak næren gig gegenne som i nedje og riggend
	c. If so, does the schedule address the inspection of the following items:	S			
	i. monitoring equipment?	sionshooth-e-sin/P			<u> 44                                  </u>
	ii. safety and emergency equipme	ent? <u>L</u>	/ ************************************	E William	· · · · · · · · · · · · · · · · · · ·
	iii. security devices?	GG - John Market		a <del>Valorino de la co</del> spe	
	iv. operating and structural equal ment (i.e. dikes, pumps, etc		annelmon-diffi-hill	**************************************	. Carrier of the control of the cont
	v. type of problems to be looke for during the inspection (e leaky fitting, defective pur etc.)?	e.g.	yr.	© Skolinkoviškova	
	vi. inspection frequency (based the possible deterioration of the equipment)?	upon rate	<b>Q</b> eew-g-suin	29 widergelt-yleckensonia musik	DALLY MEETIL
	d. Are areas subject to spills inspect to spill inspec	pect-		T COMMUNICATION	
	e. Does the owner or operator main an inspection log or summary of owner or operator inspections?	tain	r 45 Viirtus täileet	in takensusyanang	
	f. Does the inspection log contain following information:	the			
	i. the date and time of the in	spection? 些	**************************************	b	
	ii. the name of the inspector?		, stoto Entire pro-	p spenimenocalities	
	<pre>iii. a notation of the observation made?</pre>	ons		SCO NON DESCRIBER en marken access	
	iv. the date and nature of any repairs or remedial actions	? <u>L</u>		Thy (2/55/disorbennosionen	
5.	Do personnel training records include: 265.16				
	a. Job titles?	OTHER PROPERTY.		in towards	
	<pre>b. Job descriptions?</pre>	1	-	ek markilananadasis	

			ILS NO	14.7	Remarks
	c.	Description of training?	Local aminum	MDDFAM+-Democra	"PICHT TO KNOW 1 OTHER APPRICABLE
	d.	Records of training?		and the second s	Commercial
	е.	Did facility personnel receive the required training by 5-19-81?	demission accounts as a substitute of the control o	Company of the Compan	
	f۰	Do new personnel receive required training within six months?	Malaneco ercanaca	Ф.25-досимент.тр	White the contract of the cont
	9.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	4	·	12/5/86
6.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7		. *
	ā.	Special handling?	SALITO-ATOMOS HATOVALATORISTS		23/4
	b.	No smoking signs?			
	C٠	Separation and protection from ignition sources?		<u> </u>	

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

		•				
9 8		tenance and Operation acility: 265.31	YES	NO	NI	Remarks
	e h	s there any evidence of fire, xplosion, or release of azardous waste or hazardous aste constituent?	V to Co		emmings-britishing	NOT RECENTED - HENCHE
2.	If r have	equired, does the facility the following equipment: 265.32				LOSSES ARE PERSONNEL AND
	a.	Internal communications or alarm systems?	<u></u>	landistandstima	<b>C</b> istoniancio	DASTERA L
	b.	Telephone or 2-way radios at the scene of operations?		etermonië		Phones
	C	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	S. Harrison		Gesselds (SEE) weeks	
	Indi	icate the volume of water and/or foa	m avai	ilable	for fi	re control:
	.*	CITY WHITE AUGUST	310			
3.	Tes:	ting and Maintenance of rgency Equipment: 265.33			ang	
	a.	Has the owner or operator established testing and maintenance procedures for emergency equipment?	- Control of the Cont	/		wearer residen
	b.	Is emergency equipment maintained in operable condition?	¥			(2048) (CET
4.	imm	owner or operator provided ediate access to internal rms? (if needed) 265.34	1/	/ 	жанайская	
5.		there adequate aisle space unobstructed movement?	B	grand and the second	4Edrillom 10-hot he	MAPPINER HOUSE
6.	to aut	the owner or operator attempted make arrangements with local horities in case of an emergency the facility?	·	<u> </u>		6000 anniverse

#### Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

- Does the Contingency Plan contain the following information: 265.52
  - a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
  - b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
  - Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
  - d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
  - e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

1	<del> </del>	WALL DECOMENSUS
		ACTIONS

Therein consists assessed to the constitution of the constitution

La communication designation

	ā۰	Is the facility Emergency Coordinator identified?	1	<u></u>	Nis. Roppes
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?		q-annocalació	
	C.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		menty (25) which state (25)	
4.	Eme	ergency Procedures 265.56			
	at Co	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency ocedures listed in 265.56?		· "	NO ENERGENCY HE

YES NO

NI

Remarks

			E:	MANIFEST	SYSTEM, R	ECORDKEE	PING,	AND REP	ORTING: (Part 265 Subpart E)
			<sub>affest</sub> Sy	stem 2	65.71	YES	NO	MI	Remarks
		roc {rar the gene	the facil deduces listers the second control c	ity follo ted in §2 h manifes sending a ifest bac	st? a copy of ck to the		шануудананында	Managoperagop	
	5.		records of ined for 3		ipments	E-market 1	миниминир	Associamentelebracentel	
	requ	uirem	owner or lents regar incies?			<u>'</u>		livensemmy	DISCRETONICES TO
of (	on-s	ite f	le to owner facilities waste from	that do	not				RARE
3.	0pe	ratir	ng Record	265.73					
	à.	mair	the owner ntain an op ord as requ .73?	erating	ator		,	Mandanianian	WASTE RECIBING (NO)
	b.	cont	the operation:		ord				0000 446 600
		i.	The method of each wa storage, of required in Appendix 1	ste's tr or dispos n 40 CFR	eatment, al as	es de la constitución de la cons	and the second s	Wildfords Hab	·
		pr 1		rdous was (This i cross-re ic manife was accom	te within t nformation ferenced st number,		makephonologists.		
	***j	ii.	A map or o						
•	***	T.	- annliee ti	a disposa	3	£	1		4/82-A

			1E3	NO	MT	kemarks
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	•			
	İ۷۰	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	enterprise (naturales)	
	٧٠	Reports detailing all incidents that required implementation of the Contingency Plan?	Nationenama	www.pullumorbeat2020	and the same	booken at kent if
	۷i.	All closure and post closure costs as applicable?	\$	Westklewiesenstels	йыны жүүлікуна ф	requient.
4.	Availa	bility of Records 265.74			•	
-	Are al under inspec	l facility records required 40 CFR Part 265 available for tion?	<u> </u>	******************************	dancilaliidejensje	
5.*	*Unmani	fested Waste Reports 265.76				
	ha ge wi	s the facility accepted any zardous waste from an off-site nerator subject to 40 CFR 262.20 thout a manifest or or shipping uper?	Gra-William Ala	and the same of th	/ · ««««««»	1367 GC012714
	of de an	"a" is yes, provide the identity the source of the waste and a scription of the quantity, type, and date received for each unmaniested hazardous waste shipment.		erig erigi vili silik me destina erita el		freeerons

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

				<u>Section G</u>	<u> </u>	<u>OST CL</u>	<u>OSURE</u>	(Part	_5 Subpart G)
	-		•			YES	МО	NI	Remarks
\$	Clos	ure	265.	112					
	a.			ility closu able for i			deskovaniesvana	······································	
	b.	Does	the p	lan identi	fy:				
		o ·		m extent uncility life	nclosed dur- e?		ji instarratornia	\ \ \	NO PARTIAL CLOSURES
	į	ii.	maximu ventor	m hazardous y?	s waste in-			EDGG ST. S.	**************************************
	ŗ	ĺ٧.	estima	ted year o	f closure? '	1	No.	шараларыд.	2009.4-0.
		٧٠	schedu	le of clos	ure activities?	1/	management of the second		
	c.	Has	closur	e begun?			1	********	
2.	Post	t-Clo	osure	265.118					
	à.		the pos inspec		plan available	4ndis/20hurus	******	and the first of t	
	b.	Does	s this	plan conta	in:				4
		ì	monito	ption of g ring activ ncies?		\$74×155×44Ecroph	· azaidahannapagag		
	i	i i .		ption of ma ties and fi					
			S	over, or co	f cap, final ontainment where appli-	Brazzi <sup>N</sup> i-vi-vizo	ūm daramona.	an employee and a second	
				acility mon	nitoring equip-				
	įį	ii.	name, of per	address, an	nd phone number ice to contact ure care period		meril Nervillities 52 ir	manan-guyana	
	C.	Has	the po	st-closure	period begun?	West Alleren	MARKET AND		
	ď.			tten post- vailable?	closure cost 265.144	46/9a/2-400kman	en-construction		

Applies only to disposal facilities.

# Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		TES NO	N I	kemarks
	Are containers in good condition? 265.171	¥	REPORTED STATES	SOME ARE MARGINAL
2.	Are containers compatible with waste in them? 265.172	ocalillación amanormas	- @2406500000000000000000000000000000000000	BUT STILL OK
3.	Are containers managed to prevent leaks? 265.173		V-MA-vodim	
4.	Are containers stored closed?		##PANAGO ANTENIOS	
5.	Are containers inspected weekly for leaks and defects.	<u> </u>	skelecoccus.g.	DAILY
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176		
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177			
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	. diaginadala makapunjagun		

# Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 TANKS 2. Do uncovered tanks have at BOTTOMS least 60 cm (2 feet) of freeboard, or dikes or other containment structures? CONTAINED 3. Do continuous feed systems have a waste-feed cutoff? BATCH ADDITIONS 4. Are waste analyses done before the 265.193 tanks are used to store a substantially different waste than before? DEDICATED TANKS 5. Are required daily and weekly inspections done? 265.194 6. Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.) 8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? Tank capacity: \_\_\_\_gallons Tank diameter: feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids

Distance of tank from property line \_\_\_\_

Code - 1977" to determine compliance.)

Section A: Sc	op	e
---------------	----	---

Complete this Appendix if the <mark>owner or operator of a</mark> TSD facility also <mark>ge</mark> n	erates
hazardous waste that is subsequently shipped off-site for treatment, stora or disposal.	ge,
01 41390341.	

,	or a	isposai.			
Sect	ion E	3: MANIFEST REQUIREMENTS (Part 262, Subpart	t B)		
			YES NO	NI	Remarks
(1)	Doe: ava	s the operator have copies of the manifest ilable for review? 262.40	<u> </u>	SOLALS SURJEMENT OF SURJEMENT O	
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	<u>Q</u>	•	
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21			
	a.	Manifest document number?		**************************************	-valor-transmission, comments and comments and complete the complete transmission and complete t
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	_/_	4	
	C.	Name and EPA ID Number of Transporter(s)?	<u> </u>	Stage St., and St.	VALEY CITY REFUE
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?		Saprojský Eddy <del>s-y-d-dis</del> uddh	COLD SHIEZO
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u></u>		WAYNE DISPOSAL PETRO -CHEM
-	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u> </u>		Bock + Oping
	g.	Required certification?	<u> </u>		
	h.	Required signatures?	<u> </u>		Protestantian and the state of
(4)	Rep	oortable exceptions 262.42			
	a.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility we ment.  MANIFEST # MT C	e generat vithin 35	tor has b days of	<u>NOT</u> received a the dațe of ship-
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26	number ( 52.42) to	for whic the Reg	h the generator ional Administra-

Sect	ion	C: PRE-TRANSPORT REQUIREMENTS (Part 262, Sub	part	C)		•
og v	with (Req	waste packaged in accordance DOT regulations? United prior to movement of Orderdous waste off-site) 262.30	YES	NO	NI	Remarks
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous ce off-site) 262.31 262.32			World and State of St	·
3.		required, are placards available to asporters of hazardous waste? 26,2.33	<u> </u>		**************************************	
4.	wast with and	site accumulation of generated hazardous wast te it generates either (A) in its storage fac n 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects option Section D. If the installation elects option ns: See 40 CFR 262.34 January 11, 1982 Revi	ility restron A, B, co	[265] icts chec	.l(b)] all ac k this	or (B) in accordance cumulation to tanks box X and skip
	3.	Is each container clearly marked with the start of accumulation date?	Constitutive and the	ente Pro <del>unt S</del> SSSSSS		
	b.	Have more than 90 days elapsed since the date inspected in (a)?	<del>ئىرىسىدەكسىرى</del>		. <u></u>	
	c.	Do wastes remain in accumulation tanks for more than 90 days?	<del> </del>	s months and	· · · · · · · · · · · · · · · · · · ·	<u></u>
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	designation of	ARTINI PROFESSIONAL PROFESSIONA	n n-v-m-v-v-v-mahr	
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpa	rt D)		
1.	nee min	all test results and analyses ded for hazardous waste deter- ations retained for at least ee years? 262.40	YES	NO NO	ΝI	Remarks
Sec	tion	E: - INTERNATIONAL SHIPMENTS (Part 262, Subj	part E	()		
].		the installation imported or orted Hazardous Waste? 262.50	man-Microscovi			
		answered Yes, complete the following applicable.)				
	a.	Exporting Hazardous waste; has a generator:				

### Appendix TR

Sect	ion A: SCOPE:	YES	NO	N	I	Remarks
The state of	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.				Magna ann an	
2.	Does the transporter transport hazardous waste into the U.S. from abroad?	vodossarežodna	<u></u>			
3.	Does the transporter transport hazardous waste out from the U.S.?	<b>БОООДИТЕНСКИ АЦ</b> Э		/	-monenturys.	
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	شبن <del> آا</del> انستان	<u>-i</u>		<del></del>	
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	ع	Subp	part B)
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22			-	No. of Laboratory (No.	
2.	Estimate the number of manifests for shipments completed during the part 6 months.	skritistorek Shanitikk	<u> 199</u>	)	-	
3.	Examine a representative number of manifests. Indicate number examined.	and the same	25	>	illiarasii 1577 (1574).	_
4.	Did transporter properly sign and date the manifests examined?	4		na.	<b>∞</b> -∞-∞	
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	econtradition of			NOTACES ANNOUNCES	
	If (5) is "no," skip 6 and 7.		***************************************	nes		nationareae auto-oversationareae anno anno anno anno anno anno anno a
6.	Do any manifests indicate shipments delivered to other than an alternate facility?	***************************************	installation a	an-	<del>Quoce-linios</del>	
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?		Across across a	ntis-	encetorio No <sup>n</sup> io	

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY GORDON E. GUYER KERRY KAMMER O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

ROMALD-0:-SKOOG; Director

Gordon E. Guyer, Director
State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503
Phone: 616-456-5071
July 25, 1986

Ms. Sharon Burns Gold Shield Solvents 312 Ellsworth Ave., S. W. Grand Rapids, MI 49503

RE: MID 020906764

Dear Ms. Burns:

This correspondence is written to acknowledge receipt of your letter dated July 15, 1986, which itemizes actions taken by the company to correct deficiencies noted during the RCRA inspection on July 11, 1986.

Therefore, this is to notify you that at this time the company has corrected the violation(s) identified in the compliance letter of July 14, 1986, with regard to the Resource Conservation and Recovery Act.

Sincerely,

Dale M. DeKraker

Environmental Quality Analyst

Hazardous Waste Division

DMD/mn

cc: m. Murphy, U.S. EPA, Region V (w/enc.)



### GOLD SHIELD SOLVENTS

Division of Detrex Chemical Industries, Inc.

312 ELLSWORTH AVE., S. W. GRAND RAPIDS, MICHIGAN 49503

Area Code 616 Phone 454-9269-454-0443

July 15, 1986

WASTE DI

JUL211986

Mr. Dale DeKraker State Department of Natural Resources State Office Building 350 Ottawa N.W. Grand Rapids, MIchigan 49503

Dear Mr. DeKraker:

MIO 020 906 764

During your July 11, 1986 investigation of our facility located at 312 Ellsworth S.W., Grand Rapids, MIchigan, we were found to be in violation of the requirements of Subtitle C of RCRA. Specifically, a copy of Manifest # MI 0823982 dated February 20, 1986 had not been received from the disposal facility.

Enclosed please find a copy of noted manifest, signed by the disposal facility with a documenting letter attached.

If further clarification of our compliance is requested please contact me.

Sincerely,

Sharon Burns

Gold Shield Solvents division of DETREX CHEMICAL CORPORATION

XG: EPA-REGION R



# GOLD SHIELD SOLVENTS Division of Detrex Corporation

12886 EATON AVE., DETROIT, MICHIGAN 48227

Telephone (313) 491-4550



JUL2.1986

To Whom it May Concern

100 m 26 5 m 6 26 26 20 20 20

This manifest MI 0823982 was mailed to Gold Shield, Grand Rapids on March 3, 1986 we accepted this material in our plant on February 20, 1986, Attached please find copy of same. I feel this document was lost in the mail.

Sincerely yours,

Barbara Hooper

Secretary

Gold Shield Solvents, Detroit,



# O SHIELI

Division of Detrex Chemical Industries, Inc.

312 ELLSWORTH AVE., S. W. GRAND RAPIDS, MICHIGAN 49503

Area Code 616 Phone 454-9269-454-0443

November 2, 1984

Department of Natural Resources State Office Building 350 Ottawa N.W. Grand Rapids, MIchigan 49503

Attention: Mr. Dale M. DeKraker

> Water Quality Specialist Hazardous Waste Division

MID 020 906 76%

In answer to your letter of October 22, 1984, the following has been accomplished:

Item # 1 - Waste Analysis Plan has been implemented and procedure is now on file. (Plan attached)

Item # 2 - Open Containers have been closed and will be an item listed on the new inspection list.

I hope this will meet with your approval and if you have any questions please do not hesitate to call.

Very truly yours,

James H. Harrison Branch Manager

GOLD SHIELD SOLVENTS Division of Detrex Chemical

JHH/sb

XC: EPA REGION I

RECEIVED

JOHN BOAUNSIEY / CAE FLONOV

HAZARDOLIS WASTE DIVISION

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON E. R. CAROLLO MARLENE J. FLUHARTY STEPHEN F. MONSMA O. STEWART MYERS BAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 November 13, 1984

Mr. James Harrison Gold Shield Solvents 312 Ellsworth St., S. W. Grand Rapids, MI 49503

RE: MID 020906764

Dear Mr. Harrison:

This correspondence is written to acknowledge receipt of your letter dated November 2, 1984, which itemizes actions taken by the company to correct deficiencies noted during the RCRA inspection on October 19, 1984.

Therefore, this is to notify you that at this time the company has corrected the violation(s) identified in the compliance letter of October 22, 1984, with regard to the Resource Conservation and Recovery Act.

Sincerely,

Dale M. DeKraker

Water Quality Specialist Hazardous Waste Division

Does Dakraker

DMD/mn

cc: EPA Region V Bohunsky/C&E A. Howard

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J ANDERSON E. R. CAROLLO MARLENE J. FLUHARTY STEPHEN F. MONSMA O. STEWART MYERS RAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 October 22, 1984

Mr. James Harrison Gold Shield Solvents 312 Ellsworth, S. W. Grand Rapids, MI 49503

RE: MID 020906764

Dear Mr. Harrison:

On October 19, 1984, staff of the Department of Natural Resources conducted an investigation as an agent of U.S. EPA of your facility located at 312 Ellsworth, S. W., Grand Rapids, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA in the following areas:

- 1) The company has no waste analysis plan as required by 40 CFR, Part 265.14(b).
- 2) Many of the containers being used to store hazardous waste heels (F002) were not stored closed as required by 40 CFR, Part 265.173(a).

We request that you respond to this letter by November 5, 1984, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to December 1, 1984. The DNR will evaluate your response and forward a copy of the response to the U.S. EPA along with a recommendation on your facilities compliance status.

If you have any questions, feel free to contact Dale DeKraker at the above number and address your response to the above address on this letter.

Sincerely,

Ronald C. Waybrant, Ph.D District Supervisor

Hazardous Waste Division

RCW/DMD/mn

cc: EPA Region V (w/ enc.)

J. Bohunsky/C&E file Al Howard, HWD



Division of Detrex Chemical Industries, Inc.

312 ELLSWORTH AVE., S. W. GRAND RAPIDS, MICHIGAN 49503

Area Code 616 Phone 454-9269-454-0443

October 18, 1983

Department of Natural Resources State Office Building

350 Ottawa N.W.

Grand Rapids, MIchigan 49503

RECEIVED

OCT 2 0 1983

HAZARDOHS WASTE DIVISION

Attention: Mr. Dale M. DeKraker

Water Quality Specialist Hazardous Waste Division

In reply to your letter of 9/13/83:

RE: MID 020906 764

- 1. A directive has been issued by our corporate offices regarding inspection, training etc. copy attached.
- Responsible parties have been notified as to the correct freeboard minimum.

In reply to your letter of 9/16/83:

- Concrete containment will be repaired and water tight before 11/1/83. Repairs will commence on 10/22/83 and are expected to be completed 10/25/83.
- Drum waste being stored in basement will be shipped via licensed Hazardous Waste hauler by 11/15/83. Bulk storage tanks will be fabricated and in use before 1/1/84.
- 3. Problem addressed in item # 2 above.

I hope this meets with your approval and if you have any questions, please do not hesitate to call.

HWO - LANSING

Very truly yours.

James H. Harrison Branch Manager

GOLD SHIELD SOLVENTS

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER E. M. LAITALA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY

AMES J. BLANCHARD, Governor DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

350 Ottawa Avenue, N. W. Grand Rapids, Michigan 49503

September 13, 1983

Mr. James Harrison Detrex Chemical Industries, Gold Shield Division 312 Ellsworth Ave., S.W. Grand Rapids, MI 49507

Re: MID 020906764

Dear Mr. Harrison:

On September 7, 1983, staff of the Department of Natural Resources conducted an investigation of your facility located at 312 Ellsworth Ave., Grand Rapids, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. The completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

- An inspection schedule was not available as required in 40 CFR, 265.15.
- Tanks used to store waste heels were not being operated with a minimum of two feet of freeboard as required in 40 CFR, 265 Subpart J. One tank had a freeboard of about six inches while a second tank had only one - two inches of freeboard.

We request that you respond to this letter by September 26, 1983, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to October.

If you have any questions, feel free to contact Dale DeKraker at (616) 456-5071. Please address your response to the above address on this letter.

Sincerely,

HAZARDOUS WASTE DIVISION

Monald C. Waybrant, Ph.D. District Support

District Supervisor

RCW/DMD:bjc

enc.

cc: EPA, Reg. V (w/enc.) HWD (w/enc.)

R1026-1

# RCRA Inspection Report

EPA Identification Number: M I D	020900	0764
Installation Name: DETREX CHEMIC		
Location Address: 312 ELLS WOR	ETH S.W.	Tilden or graphy to a recommendate
City: GRAND RAPIOS	State: MICHIGAN	
Date of inspection: 10-19-84	Time of inspection (from)	8:30AM (to) 11:00
Person(s) interviewed	Title	Tel ephone
Mr JAMES HARRISON	BRANCH MANAGER.	459-9269(616)
Inspector(s)  Dale Dekraken.	Agency/Title MICHIEN DNA	Tel ephone 456-567/(616)
RONALD WAYBRANT	et et	64 0-6
Installation Activity (mark only one	box)	Inspection Form(s)
	CFR 265.1 and/or	Á
☐ Treatment/Storage/Disposal (no gen	neration or Transportation)	Α
☐ Generation and Transportation		B, C
☐ Generation only		В
		С
•		

KL: EPA REGION IF

#### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	catio	n process(es) (EPA Form 3510-3)	Inspection Form	A section(s)
501	X	storage in containers		(I)
S02	M	storage in tanks		<b>①</b>
rot	II	treatment in tanks	, ,	J
S04		storage in surface impoundment		K,F
T02		treatment in surface impoundment		K,F
D83		disposal in surface impoundment		K,F
\$03		storage in waste pile		L
D81		disposal by land application		M,F
D80	İl	disposal in landfill	,	N,F
тоз		treatment by incineration		0/P
ТО4		treatment in devices other than ta impoundments, or incinerators	anks, surface	Q .
Other activities	<u>.</u>			
GENERATOR	M		APPENDIX	GN
TRANSPORTER	M		APPENDIX	TR

- 3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

  NOTHING OMITTED, HOWEVER, COMPANY IS IN THE PROCESS OF REUSING ITS PART A TO ALLOW FOR GREATER STORAGE CAMPANY.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

TOY IS EXEMPT FROM RCRA AT THIS TIME.

#### Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B) YES NO V 1 \* Remarks Has the Regional Administrator been notified regarding: 265.12 Receipt of hazardous waste from a foreign source? NONE\_RECIEVER Facility expansion? EXPANSION Change of owner or operator? LO CHANGE 2. General Waste Analysis: 265.13 Has the owner or operator obtained a detailed chemical and physical analysis of the waste? REFLUX ProcEDURE SPECIEL GRAVITY Does the owner or operator have a detailed waste analysis plan on file at the facility? c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? Security - Do security measures include: (if applicable) 265.14 24-Hour surveillance? or b. i. Artificial or natural barrier around facility? ii. Controlled entry? c. Danger sign(s) at entrance? Owner or operator inspections: 265.15 Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that

may affect human health or

the environment?

			YES 1	NO N	I	Remarks
b.	have	the owner or operator an inspection schedule the facility?		2.455E-45/25-474	**************************************	Newson Company for the Company of th
Ċ.		o, does the schedule address inspection of the following ns:				
	ę, o	monitoring equipment?	1		<del></del>	
	ii.	safety and emergency equipment?	<u>V</u>	VIII MUURAURA	* <del>************************************</del>	
	iii.	security devices?	96/mm.c.e		V	NO FORMAL SECONG
	iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	Barret			DEVICES
	٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	Berlin	was a second and a second a second and a second a second and a second	Manage sympothylapsan	
	vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?		Militan imagi.		DAILY, weekly
d,		areas subject to spills inspect- daily when in use?	Lord		*	
e.	an	s the owner or operator maintain inspection log or summary of er or operator inspections?	· Samuel Control	./	M-Conference and occurrence	LOG BEING REUSED
f		s the inspection log contain the lowing information:				MATCH SCHOOLE
	i.	the date and time of the inspection?				
	ii.	the name of the inspector?	Parameters.	. ,		an ann an
	71.	a notation of the observations made?	Expression of the second	link.jugupanya	<del>Good Congress (100 s o</del>	
	iy.	the date and nature of any repairs or remedial actions?	<u>L</u>	HARITAGO AROYA GA	entrace-co-vi-	
Do persinclude		training records 65.16				
a	. Job	titles?	L	<del></del>	*****	1.D
b	. Job	descriptions?		attate or the contract of the	war kallen carried in	

			160 160	14.5	Venerya
	c.	Description of training?		amstivina.	MSU COURSES
	d.	Records of training?	read decade same	and the state of t	
	e.	Did facility personnel receive the required training by 5-19-81?		general terr <sup>to co</sup>	p = 1 111  White the many receives the first No. No. No. No. No. No. No. No. No. No.
	f.	Do new personnel receive required training within six months?		Филтаманировар	WFFFFFF China dasharan masamada sasamada sasaman di sasamada di cikil MFFFFFFFFFFFFFFFFFFFFFFFFFFFFFFFFFFFF
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?		Nagopan Meliki	4/10/84
5.	rec	required, are the following special quirements for ignitable, reactive, incompatible wastes addressed? 265.	17	÷	
	a٠	Special handling?	Section 100-4-maintaine	- Land	WASTES ARE NOT
	b.	No smoking signs?		1	16NITABLE REACTIVE, OF INCOMPATIBLE.
	C.	Separation and protection from ignition sources?	Aumentifactory of the Mathematical States of the States of	L.	

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1.		ntenance and Operation Facility: 265.31	YES	MO	No.	Domanica
	1	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	[ L J	110	17.1.L	Remarks
2.		required, does the facility e the following equipment: 265.32				
	ð.	Internal communications or alarm systems?		entri Cirisinassasi	Фототальный	DOICE SUFFICIENT
	b.	Telephone or 2-way radios at the scene of operations?	3	NAMES OF THE PARTY	provided associated a recogni	JELEPHWE
	C.	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	· ·	grander to the	<b>С</b> чениями <b>г</b>	
	Ind	licate the volume of water and/or foa	n avai	lable	for fin	re control:
		CITY WATER - U	JLISAF	2.23	COPLY	
					North Albert Connection to Make the	ophilos (1904) A Gazanda ya ushimmanka raspun kata da kisio nanyin mama ummah ki 1904 A Gazanda ya Ushin ki kanjin na Gazanga maya kata da kanjin da
3.		ting and Maintenance of ergency Equipment: 265.33				
	a.	Has the owner or operator established testing and maintenance procedures for emergency equipment?	<i>V</i>	and the description of the second	• • • • • • • • • • • • • • • • • • •	AIR PACK - 2/VENLY
	b.	Is emergency equipment maintained in operable condition?	enmontorio e isa	all Elictric (C) in Elizapposi	ФФилиператорую	FIRE EXAMINATES - PUTETERS
4.	imm	owner or operator provided mediate access to internal arms? (if needed) 265.34	2	Westpermann mass	قالمانىلىلىلىلىدى	
5.		there adequate aisle space unobstructed movement?				
6.	to aut	the owner or operator attempted make arrangements with local horities in case of an emergency the facility?	-1-		шайлагердеры	FIRE DEFT DNR
			C 3	1		POLICE 4/82-A

Section D:	CONTINGENCY	PLAN	AND	EMERGENCY	PROCEDURES:	(Part	265	Subpart	10

YES NO NI Remarks

1.	Does	the	Contingency	Plan	contain	the
			information		265.52	

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

	manage desired	

V NOT APPHICABLE

ON-SITE OFFERD TO
LOCAL ORGANIZATIONS

		12 10	17.1	1,4104.4.3
3.	Emergency Coordinator 265.55			
	a. Is the facility Emergency Coordinator identified?		PLEIJANAAN III.	Mr HARRSON
	b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u> </u>	de-State and security	
	c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	Land or the same of the same o	MATERIAL AND AND AND AND AND AND AND AND AND AND	
4.	Emergency Procedures 265.56			
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			Alasta uas converto

	•														
		•	<u>S</u>	ection E:	MANIFES	ST SYSTEM,	RECOR	DKEE	PING,	AND REP	ORTING:	(Part	265 S	ubpart	E)
								YES	ИО	NI	Remarks				
k *	1.	Use	of M	anifest Sy	stem	265.71							•	:	
		<b>d∙</b>	proc proc (Par the gene	the facil edures listessing eacticularly signed manerator with very.)	ted in { h manife sending ifest be	§265.71 fo est? a copy of ack to the	2	Editable Transport	<b>Williams</b>	- The state of the	PACAPTGEN-A-Savialization mail	Oddinatari ndaraž – tilo st		etimotiru un aeropyyyysidile	
		b.		records of ined for 3		hipments		NAMES OF THE OWNER, WHEN THE O	POWERVARIAN	*********	такт жүктеринен жана жана жана жана жана жана жана ж			ZIEL-VOZ-ALHENNENNAMENE ZIZI-VA FÇANÇÎŞ Ç	Calman Straight Strai
k <del>*</del>	2.	requ	uirem	e owner or ments regar modes?				NOS-AND-A-PROMESO	WPPOPAGAS MANUAL IN	₩n/AS-MillerSp.	AND REPORTED THE TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF TAXABLE AND ADDRESS OF	and July and State of	and commission of the commissi	- Armett valent collision (CP-10-100) - Armite collision (CP-10-100)	Saintijoertina andych
**	of	on-s	ite f	ole to owner facilities waste from	that do	not	S .								
	3.	0pe	ratir	ng Record	265.73										
		g.	mai rec	s the owner ntain an op ord as requ .73?	erating			V		- The state of the	500D	OFFE	tivs.	LECOR	<u>o</u>
		Ь.	con	s the opera tain the fo ormation:											
			i.	The method of each was storage, required Appendix	este's t or dispo in 40 CF	reatment, sal as		¥		-	Self-4-wh-v-abuses accused	CORRESPONDE AND AND AND AND AND AND AND AND AND AND	 44-úð Göðustiskrivsklarvsk		er en en en en en en en en en en en en en
	·		ን ት •	The locat each haza facility? should be to specifif waste by a mani	dous wa (This) cross-r ic manif was acco	iste withi informati referenced est numbe	n the on		eventualista (iv	L.	<b>Garra-samul</b> derstrasserskam	m <sub>e</sub> mpyrana a meno-meno-meno-			ndZZZZne (Killingvin C.S.)
		太许女人	11.	A map or cell or d											

<sup>\*\*\*</sup> only applies to disposal facilities

• '•	•		LLJ	NO	14 T	IX	CHOIVS	,	
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	Mystyleigh telephology	wmg.hasilminado	CELES - man reflection.				nadium Sangija
	įν.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	-		minuth in the State of the second	din	Элигиндий араба Ауран (араба (араба (араба (араба (араба (араба (араба (араба (араба (араба (араба (араба (ар		
	V .	Reports detailing all incidents that required implementation of the Contingency Plan?	V		, , , , , , , , , , , , , , , , , , ,		ala Salatan Varanco suo canan en dual Penduka ny M		omegalanco misededy
	۷i.	All closure and post closure costs as applicable?		-	, <del>(2006/2012)</del>		gent in diele erweise der Bertreite erweise der Bertreite erweise der Bertreite erweise der Bertreite erweise		ad yawa makee MIN ook basiin ii Alib
1. A	vailal	bility of Records 265.74							
· u	nder	l facility records required 40 CFR Part 265 available for tion?	<u>~</u>	g a de de de de de de de de de de de de de	A Openingan	*	nigga apamayan resourcembal relativistics		<del>yangan</del> yaji <del>an kati</del> stisis
5.**U	nmani	fested Waste Reports 265.76							·
a	ha ge wi	s the facility accepted any azardous waste from an off-site enerator subject to 40 CFR 262.20 thout a manifest or or shipping aper?	waso reduced by	Sign white state of the state o	#Zemelydiconthy		e diametria di mangga nyambana negataka 1987.		·
b	of de ar	"a" is yes, provide the identity the source of the waste and a escription of the quantity, type, and date received for each unmaniested hazardous waste shipment.	MA. MORPHONIA	an anno e da come e e de come e e e de come e e e e e e e e e e e e e e e e e e					

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

# Section G = CLOSURE AND POST CLOSURE (Part 205 Subpart G)

		1E2 MO	IV I	Kellia rks
1.	Closure 265.112	ī		
	a. Is the facility closure plan available for inspection?	V management	&«Мънтонција»	
	b. Does the plan identify:			
	i. maximum extent unclosed dur- ing facility life?		<b>«</b>	1000/0
	ii. maximum hazardous waste in- ventory?	and area of the same of the sa	all and proposed supply	
	iv. estimated year of closure?	1	9-dalwase⊭	2009
	v. schedule of closure activities?	1	Gardening CD, Marrier	Matter and the second s
	c. Has closure begun?		and the same of th	
*2.	Post-Closure 265.118			
	a. Is the post-closure plan available for inspection?	Mahali dagan aya Mahali ya kasa S		
	b. Does this plan contain:			٠.
	i. description of groundwater monitoring activities and frequencies?			
	ii. description of maintenance activities and frequencies for			
	AA. integrity of cap, final cover, or containment structures, where applicable		b-in-(b-r-page-tras	
	BB. facility monitoring equip-			
	ment iii. name, address, and phone number of person or office to contact during post-closure care period		WYY SPACE CHARGESTAN	
	c. Has the post-closure period begun?	American Company Company Company	ádl Falliffinnskur mis g*up	
	d. Is the written post-closure cost estimate available? 265.144	generative deli Codonio	HIGH REPORT AND ADDRESS OF THE PARTY AND ADDRE	

<sup>\*</sup>Applies only to disposal facilities.

# Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES NO	NI	Remarks
	Are containers in good condition? 265.171	V	enzuruský ovelen	African runna sacan per intermenen per angula salagan aggin berlugan kalagan salagan runni sacan sagan per angula sac
2.	Are containers compatible with waste in them? 265.172	<u> </u>	P sireconstateurs;	
3.	Are containers managed to prevent leaks?	- Comment of the Comm	to anni proposa nago	
Ĵ.	Are containers stored closed?			UMSTE HERS STORED
5.	Are containers inspected weekly for leaks and defects.	E annual	- Marine	CONTAINED
5.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if	265.176		
	waste is ignitable or reactive).	STATE CONTROL OF THE PARTY OF T	**************************************	DOT LANTER E A.
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	Administrative Control of the Contro	nare, wastern-general	REACTIVE
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			

## Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1.	Are tanks used to store only those wastes which will not				
	cause corrosion, leakage or premature failure of the tank? 265.192	AUGUSTANIAN AUGUSTAN OPERIOR			merceles militar in the delivery manufacture.
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	<u> </u>	CON5T)	9NMONT	
3.	Do continuous feed systems have a waste-feed cutoff?		BATU	+ 400	noceation (NEW PRo-To-To-To-To-To-To-To-To-To-To-To-To-To
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193	<u> </u>	ALWAYS THE	SME
5.	Are required daily and weekly inspections done? 265.194	· ·	NACESTANIA NA PARAMENTANIA		nagomonom, accompt and idjusticities (SS)
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 2 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.198 		NOT IGNITABLE	5
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	and accounts —		NOT REACTIVE	entering groups made accommon for the State of S
8.	Has the owner or operator observed buffer zone requirements for tanks	the National containing i	Fire Protec Initable or	tion Associations reactive wastes?	
	Tank capacity:gallons		N/4	4	
	Tank diameter:feet  Distance of tank from property 1	lina		feet	
	(See table 2 - 1 through 2 - 6 c Code - 1977" to determine compli	of NFPA's "Fl			S

Section A: Sco	ре
----------------	----

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	•	YES NO NI Remarks
(1)	Does the operator have copies of the manifest available for review? 262.40	V
(2)	Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	HEELS FROM SOLVENT RECOVERY
(3)	Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21	
	a. Manifest document number?	
	<ul> <li>Name, mailing address, telephone number, and EPA ID number of Generator</li> </ul>	
	c. Name and EPA ID Number of	

d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

- e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?
- f. The total quantity of waste(s) and the type and number of containers loaded?
- g. Required certification?
- h. Required signatures?

Transporter(s)?

- (4) Reportable exceptions 262.42
  - a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.
  - b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.

Sec	ction C: PRE-TRANSPORT REQUIREMENTS (Part 262,	Subpart C)	
1.	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	YES NO NI	Remarks
2.	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32		
3.	If required, are placards available to transporters of hazardous waste? 262.33	<u> </u>	BUT WOULD NOT O
4.	On-site accumulation of generated hazardous waste it generates either (A) in its storage with 40 CFR 262.34 [see 265.1(c)(7)]. Option and containers. If the installation elects of to Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 R	facility [265.1(b)] B restricts all aco ption A, check this ion B. complete the	or (B) in accordance cumulation to tanks
	a. Is each container clearly marked with the start of accumulation date?	and a second second second second second second second second second second second second second second second	
	b. Have more than 90 days elapsed since the date inspected in (a)?	. Woodellinka antigranism gerennens	
	c. Do wastes remain in accumulation tanks for more than 90 days?	S-ANT-MATERS S-ANT-MATERIAL PRINTS S-ANT-MATERIAL PRINTS	
	d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?		
Sec	tion D: - RECORDKEEPING AND REPORTING (Part 26	2, Subpart D)	
٦.	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	YES NO NI	Remarks
Sec	tion E: - INTERNATIONAL SHIPMENTS (Part 262, S	ubpart E)	And the second s
1.	Has the installation imported or exported Hazardous Waste? 262.50		
	(If answered Yes, complete the following as applicable.)	•	
	a. Exporting Hazardous waste; has a generator:	•	

į		ified the Administrator in ting?	-	Счетичногом .	 Approximate de la habitita a aggine	
	îi.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?				
	iii.	Met the Manifest requirements?	 other thanks and the	hylin fylnylnyn nasa		
b.	the g	ting Hazardous Waste; has enerator met the manifest rements?				

YES NO

NI

Remarks

# Appendix TR

<u>Sec</u>	tion A: SCOPE:	YES	1 ОИ	11	Remarks	÷
٦.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.		,		RANSBETS	
2.	Does the transporter transport hazardous waste into the U.S. from abroad?			Market de Proche	50 LUENTS	FOR RECHAN
3.	Does the transporter transport hazardous waste out from the U.S.?				CONTROL NO. CONTROL OF SERVICE	
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		Luni	#*		· .
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263,	Subp	oart B)	
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	<u></u>	Add Street & Lat Cold	<b>y</b> hom cylinagas han mys		
2.	Estimate the number of manifests for shipments completed during the part 6 months.	Markey and Contact State	120		-	
3.	Examine a representative number of manifests. Indicate number examined.	DANIE VALLE (STOP)	25	er	·	
4.	Did transporter properly sign and date the manifests examined?	1		BLASHAGGASIN	ng ang kang kang kang kang kang kang kan	
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	Simbournings	Environment .			
	If (5) is "no," skip 6 and 7.	<del></del>	<del></del>	weareness.		
6.	Do any manifests indicate shipments delivered to other than an alternate facility?	WES-ALD TOTAL SEA		TOTAL CONTRACTOR CONTR	***************************************	
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	haenkon-tenaan	-AAAA Professional September 1	<del>- Long to the color</del>	anaamaaninkonaaninkon-rohekaasainink	

# RCRA Inspection Report

EPA Identification Number: M 3 0 0.	20906764
Installation Name: DETREK CHEMICAL ZNOUTH	ES - GOLD SHIELD SOCUENT DIVISION
Location Address: 312 Euswarm Ave. S. w	J :
City: CRANO RADIOS State: M	1 LCHIEGN
Date of inspection: 9-7-83 Time of i	nspection (from) 10:00Am (to) 11:5Am
Person(s) interviewed Title	Tel ephone
Mr JAMES HARRISON BONSH	MANAGER (616) 454-9269
Inspector(s)  Agency/T  Date Dekraker  Michiga	itle Telephone NONR (616) 456-5071
Installation Activity (mark only one box)	Inspection Form(s)
Treatment/Storage/Disposal per 40 CFR 265. Generation and/or Transportation	1 and/or
Treatment/Storage/Disposal (no generation	or Transportation) A
☐ Generation and Transportation	B, C
☐ Generation only	В
	С

#### INSPECTION FORM A

### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appl	icatio	n process(es) (EPA Form 3510-3) Ins	spection Form	n A section(s)
501	I	storage in containers		
S02	IF	storage in tanks		<u>J</u>
тот	II	treatment in tanks		J
\$04		storage in surface impoundment		K,F
T02	II	treatment in surface impoundment		K,F
D83		disposal in surface impoundment		K,F
\$03		storage in waste pile		Ļ
D81		disposal by land application	9	M,F
D80	Ì	disposal in landfill	,	N,F
. Т03	II	treatment by incineration		0/P
. то4		treatment in devices other than tank impoundments, or incinerators	s, surface	Q
Other activitie	<u>s</u>			
GENERATO	R I		APPENDIX	(GN)
TRANSPORTE	R II		APPENDIX	TR

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

### NONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

704 REFERS TO THE SOLVENTI RECLAM PROCESS - 15 EXCENT

		Section B: GE	NERAL FACILIT	Y STAI	<u>VDARDS:</u>	(Part	265 Subpart B)
				YES	NO	NI*	Remarks
0		the Regional Administra n notified regarding: 20					
	۰.5	Receipt of hazardous waste from a foreign so	ource?	· ·	EDDOS-ADAGEÇ		NONE RECEVED
	b.	Facility expansion?	. :	***************************************	an <del>eso , , h</del>	L	NONE PLANNETO
	C.	Change of owner or oper	ator?	apanganan di mangangan		~	NO CHANGE
2.	Gen	eral Waste Analysis: 26	5.13				•
	ä.	Has the owner or operat a detailed chemical and analysis of the waste?		<u> </u>	with limes an energy	***********	CHEMIN ADALYSIS RUGIN
	b.	Does the owner or opera a detailed waste analys on file at the facility	sis plan	Функципальный	NOTAPIAN INC.	V	SOCUENT FLOWD AT TIME OF RECYCLE Process - NO
	C.	Does the waste analysis specify procedures for and analysis of each months are also as the from of the second seco	inspection evement of	wu kecopat scan			RECYCLE - HOWEVER A  PLAN IS BEING DEVELOPED
3.	Sec	urity - Do security meas (if applicable) 265	sures include: .14				FOR WASTE COMPINAMINA
	g.	24-Hour surveillance?		mercanical and the second		<del>*************************************</del>	1541FT OPERATION
	b.	<pre>i. Artificial or natural    barrier around facil    and ii. Controlled entry?</pre>			·	**************************************	OPERATION ENTERCY INDOORS
	c.	Danger sign(s) at entrance?			MANAGEMENT - MANAG	Мун'ну просессионали до мун'н	BLOC. LOCKED AT NIGHT
4.	0wn	er or operator inspectio	ons: 265.15				
	• 5	Does the owner or operatinspect the facility for malfunctions, deteriors operator errors, and do f hazardous waste that may affect human health the environment?	or ation, ischanges t	/			
		- · · · · · · · · · · · · · · · · · · ·					

•	$\mathcal{A}_{i}$	150 100 111	Kellia FK S
hav	es the owner or operator ve an inspection schedule the facility?		
the	so, does the schedule address e inspection of the following ems:		· .
į .	monitoring equipment?		NO ACTUAL MONITORING
íi.	safety and emergency equipment?		Equipment
iii.	security devices?		NO REAK SECONT
iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?		Deniez
٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?		
vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?		
d. Are	areas subject to spills inspect- daily when in use?	<u> </u>	
an	es the owner or operator maintain inspection log or summary of ser or operator inspections?	<u> </u>	
f. Doe fol	es the inspection log contain the lowing information:		
. 1 6	the date and time of the inspection?		
ำ ำ <sub>v</sub>	the name of the inspector?	<u>.</u>	
iii.	a notation of the observations made?		
iv.	the date and nature of any repairs or remedial actions?		
	training records 65.16		
a. Job	titles?		
b. Job	descriptions?	-	

5.

		•		163	NU	. N T	Remarks
	C.	Description of training?			· ·		
	ď.	Records of training?		W			
	e.	Did facility personnel rec the required training by !	eive 5-19-81?		a	Phallicans A <sub>C</sub> S demokras	
	f.	Do new personnel receive required training within six months?		i	APPROXIMATION OF THE PROXIMATION	Можеро-«дамуна <sub>н</sub> »	
	9.	Do personnel training recoindicate that personnel hat taken part in an annual reof initital training?	IVA		**************************************	Villematu-untiplater a	
5.	red	required, are the following uirements for ignitable, re incompatible wastes address	activa	William Polymon	***************************************		DUE THIS MONTH
	a.	Special handling?				Section .	WASTE NOT IGNITARIE
	b.	No smoking signs?					ON REACTIVE
	C.	Separation and protection from ignition sources?		· ·		V	\$ ·

		The state of the s	rc 205 Subpart C)
7.	Maintenance and Operation of Facility: 265.31	VCC NO	
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	YES NO NI	Remarks
2.	If required, does the facility have the following equipment: 265	.32	3
	a. Internal communications or alarm systems?		WOICE CONTACT - SMALL PLANT
	b. Telephone or 2-way radios at the scene of operations?		TELEPHONE
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?		SORBANTS FIRE EXTINGUES
3.	Testing and Maintenance of Emergency Equipment: 265.33		
3.			
	maintenance procedures for emergency equipment?	<u> </u>	2-TIMES /VEAR
	b. Is emergency equipment maintained in operable condition?	<u> </u>	Scort AIL PAC
	Has owner or operator provided immediate access to internal		
	alarms? (if needed) 265.34	<u> </u>	TELEPHONE: "SASIL
ĵ.	Is there adequate aisle space for unobstructed movement?	<u> </u>	NO ALAMAS PRESENT.  BUT MARGINAL AT THE
) .	Is there adequate aisle space		NO ALAMAN PROSENT.

- Does the Contingency Plan contain the following information: 265.52
  - a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
  - b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
  - c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
  - d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
  - e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

 ·	<u>k</u>	MATERIAL E	SOULD LACENTI	ASS T	

FIRE

D-1

- Emergency Coordinator 265.55
  - a. Is the facility Emergency Coordinator identified?
  - b. Is coordinator familiar with all aspects of site operation and emergency procedures?
  - c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?
- 4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

	WO	NI	Remarks	
L	The second party of the se	***********	Mr HARRISON	
<u></u>	·	Parameter and parameters		
<u> </u>	-	and the state of t		
				An and the state of the state o
landigan garangan salirangan			- NETION II. S	٩
			EVAN	

	Section E: MANIFEST SYSTEM, RE	ECORDKEE	PING.	AND RE	PORTING: (Part 265 Subpart E
		YES		NI	Remarks
1. Use of	f Manifest System 265.71				
pr pr (P th ge	pes the facility follow the rocedures listed in §265.71 for rocessing each manifest? Particularly sending a copy of the signed manifest back to the enerator within 30 days after elivery.)	V	Artenan	mand and comments	
b. Ar re	re records of past shipments tained for 3 years?				
requir	he owner or operator meet ements regarding manifest pancies? 265.72				
or on-site	able to owners or operators facilities that do not y waste from off-site sources.			V-100-110	
3. Operat	ing Record 265.73				
ma red	es the owner or operator intain an operating cord as required in 5.73?	V			-
cor	es the operating record ntain the following formation:				
i.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<u> </u>	<sup>——4</sup> -пожительды — —	***************************************	
įi.	The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)				
***111.	A map or diagram of each cell or disposal area	Aristandilinings gai	en et landra egy; se	in the second stage	
	applies to disposal				3

PO Fin
<u> </u>
1 MA Co
IMPLEMENTE
C+ ProHONS

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

YES NO

NI

Remarks

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

*	Has the owner or operator of the facility implemented a ground-water monitoring system? 265.90
	If "no". Skip to number 11

2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?

If "yes", skip to number 12. If "no", continue

- 3. Does the groundwater monitoring system meet the following requirements of 265.91:
  - a. At least one well installed hydraulically up-gradient from the limit of the waste management area?

Indicate the total number of up-gradient wells.

b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?

Indicate the total number of downgradient wells.

c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?

Sketch the locations of the wells relative to the waste management area.

6.

7.

		YES NO NI	Remarks
	d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. pro- perly cased, screened, etc.)?		Nema 1 K S
4.	Has the owner or operator developed a written ground-water sampling and analysis plan that includes procedures and techniques for: 265.92		
	a. Sample collection?		
	b. Sample preservation and shipment?	Manuscriptory Georgy Active Manuscriptor	
	c. Analytical procedures?	eferencycly Addressed to december of the contract of the contr	The state of the s
	d. Chain of custody control?	Committee of the Commit	
5.	Does the owner or operator follow his groundwater sampling and analysis plan?		
6.	Is the groundwater sampling and analysis plan maintained at the facility?		
7 <b>.</b>	Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?		

8.	Wā	as the owner or operator developed of a comprehensive ground ater quality assesment program that capable of determining: 262.93	YES	NO	NI		Remarks
	đ.			,			(
	b.	The rate and extent of migra- tion of hazardous waste or hazardous waste constituents in the groundwater?		1	e-Caringo		I
	C.	The concentration of hazardous waste or hazardous waste constituents in the groundwater?			Paragraphics		,
<b>*9</b> .	wat	s the owner or operator performed statistical analysis of his ground- ter monitoring data as required in 5.93(b)?		,	X		
*10.	1110	s there a statistically significant crease (or pH decrease) detected in well?			<u></u>	ধ	
	a.	If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?		-	X	· <u>·</u>	
		Skip to number 14	<del>V-managetyless</del> ca				
17.	M! !	the owner or operator prepared a tten groundwater monitoring waiver onstration for the facility?					
	ā.	Is the waiver demonstration maintained at the facility?		,		-	
	b.	Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?	Week		Widology	****	. Ŷ
Note:		respectors should request a copy				a pro-	

c. Skip questions 12, 13, and 14.

<sup>\*</sup>These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

YES	NΟ	NI

Remarks

- 12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?
  - a. Has the plan been certified by a qualified geologist or geotechnical engineer?

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

- 13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?
- 14. Does the owner or operator submit reports and maintain records as required in 265.94?

# Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1.	Cl	osure	26	5.112							
	d.			facility closum ilable for ins		V		and the state of t	\$3639 ES	TIMATED COS	7
	b.	Doe	s the	plan identify	/ • ·				AS 07	= 1-5-13	
		i.		mum extent und facility life:		***********	Pillianne	Burren	NA		
		ii.		mum hazardous ory?	waste in-	*	-	alterna <del>magagata</del> an	~ 300 00	urn s	Three And Section 1
		iv.	esti	mated year of	closure?		****		NA		
		٧.	sche	dule of closur	re activities?	1	<del>- 10-21-4</del>				
	C.	Has	clos	ure begun?					Addings on the State of the Sta		
*2.	Pos	st-Cl	osure	265.118							
	ъ.	Is for	the p insp	ost-closure pl ection?	an available	<del></del>	WWW.Phonestonesia				
	b.	Doe	s thi	s plan contain	::				*		to return the same party of the same
		, i	moni	ription of gro toring activit uencies?					- 		
		ii.	desc acti for	ription of mai vities and fre	ntenance quencies						NATIONAL PROPERTY OF THE PROPE
			АА.	integrity of cover, or con structures, w	tainment		***************************************				
			BB.	facility moni	toring equip-						THE PERSON NAMED OF
	i	ĺį.	of po	, address, and erson or offic	phone number e to contact e care period?	-		COOP WIND	##		
	C.	Has	the p	oost-closure p	eriod begun?				**************************************	-	<del></del>
	d.	Is i	the wi imate	citten post-cl available? ;	osure cost 265.144	province beligging	Market Market Market Market Market Market Market Market Market Market Market Market Market Market Market Market				

<sup>\*</sup>Applies only to disposal facilities.

## Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		TE-S NO	14.7	kemarks
1.	Are containers in good condition? 265.171	<u> </u>		4 African Control of C
2.	Are containers compatible with waste in them? 265.172	<u> </u>		CINED CONTINUERS WHERE
3.	Are containers managed to prevent leaks? 265.173		rrestante brenstante desp	mpro orget
4.	Are containers stored closed?	<u> </u>		
5.	Are containers inspected weekly for leaks and defects.	<u> </u>	1	DAILY WISHAL INSPECTION
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176		N/A
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177			N/A
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?		<u> </u>	~/A

# Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?  2" FREE Grant Observed IN
3.	Do continuous feed systems have a waste-feed cutoff?
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?  265.193  **THE SAME WASTE
5.	Are required daily and weekly inspections done? 265.194
6.	Are reactive & ignitable wastes in tanks protected or rendered non- reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)
8.	Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
	Tank capacity:gallons
	Tank diameter:feet
	Distance of tank from property linefeet
	(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids

Section	Α:	Scope
---------	----	-------

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

ect	ion B	: MANIFEST REQUIREMENTS (Part 262, Subpart	B)			
			YES	NO	NI	Remarks
(1)	Does avai	the operator have copies of the manifest lable for review? 262.40	K	yar.	— massas 4 (specimen	1
(2)	mont	nine manifests for shipments in past 6 hs. Indicate approximate number of fested shipments during that period.	) -w	-	137E 1	
(3)	foll cop fest	the manifest forms examined contain the owing information: (If possible, make ies of, or record information from, manifics) that do not contain the critical ments). 262.21				•
	a.	Manifest document number?	<u> </u>		<u></u>	
	ъ.	Name, mailing address, telephone number, and EPA ID number of Generator	4-		¥ Skalentrysjywd ed	
	C.	Name and EPA ID Number of Transporter(s)?				
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>_</u>		<sub>VAR</sub>	PERO-CHEM
	e. <sup>-</sup>	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	€			WASTE HEEKS FOOL
	f.	The total quantity of waste(s) and the type and number of containers loaded?		<u></u>	and the second s	DRUMS ONLY
	g.	Required certification?				
	h.	Required signatures?	THAT W			
(4	) Re	portable exceptions 262.42				
	ā.	For manifests examined in (2) (except for enter the number of manifests for which signed copy from the designated facility ment.	1 615-5 (16	-uei a	LUI III	13 110   1 000 1 700 4
	. b.	For manifests indicated in (4a), enter t has submitted exception reports (40 CFR	he nu 262.4	mber 2) to	for who the f	hich the generator Regional Administra-

Sect	ion C: PRE-TRANSPORT REQUIREMENTS (Part 262, Su	bpart C)
1.	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	YES NO NI Remarks
2.	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	
3.	If required, are placards available to transporters of hazardous waste? 262.33	<u>'V</u>
4.	On-site accumulation of generated hazardous wast waste it generates either (A) in its storage fawith 40 CFR 262.34 [see 265.1(c)(7)]. Option B and containers. If the installation elects opt to Section D. If the installation elects option tions: See 40 CFR 262.34 January 11, 1982 Rev	rility [265.1(b)] or (B) in accordance restricts all accumulation to tanks ion A, check this box     and skip n B, complete the following observa-
	a. Is each container clearly marked with the start of accumulation date?	
	b. Have more than 90 days elapsed since the date inspected in (a)?	
	c. Do wastes remain in accumulation tanks for more than 90 days?	
	d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	
Sec	tion D: - RECORDKEEPING AND REPORTING (Part 262,	Subpart D)
1.	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	YES NO NI Remarks
Sec	tion E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	ppart E)
1.	Has the installation imported or exported Hazardous Waste? 262.50	
	(If answered Yes, complete the following as applicable.)	
	a. Exporting Hazardous waste; has a	

### Appendix TR

Sec	tion A: SCOPE:	YES NO NI	Remarks	
٦.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.			
2.	Does the transporter transport hazardous waste into the U.S. from abroad?	V		:
3.	Does the transporter transport hazardous waste out from the U.S.?		4	
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?			
<u>Sec</u>	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part 263, S	ubpart B)	
1.	Are copies of <u>completed</u> manifests available for <u>review</u> and retained for three years. 263.22	<u> </u>		
2.	Estimate the number of manifests for shipments completed during the part 6 months.	120 f	~ 6mos	
3.	Examine a representative number of manifests. Indicate number examined.	20	·	
4.	Did transporter properly sign and date the manifests examined?	<u>/</u>		
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21			
	If (5) is "no," skip 6 and 7.			
6.	Do any manifests indicate shipments delivered to other than an alternate facility?			
7.	Are shipments delivered to alternate facilities <u>only</u> because emergency prevents delivery to the designated facility?	and and and an and an and an an and an an and an an an an an an an an an an an an an		No. of the state o

MR JAMES HOW ISON

DETREX CHEMICAL INDUSTRIES - GOLD SHIELD DIVISION

312 ELLSWORTH AVE. S.W.

GRAND RAPIDS, MICHIGAN 49507

Re: MID MID 020706764

Dear MR HARRAGA

On September 7,1983, staff of the Department of Natural Resources conducted an investigation of your facility located at 312 ELLIWORTH AUC. GRANO LANDS, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. The completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

- IN 40 CER 265. 15.
- WITH A MINIMUM OF 2 FEET OF FREEDORD AS REQUIRED IN 40 CFR SUBPART J. ONE TANK HAD A FREEDOMRD OF ABOUT GINCHES WHICE A SECOND TANK HAD ONLY 1-2 INCHES OF FREEDOMRD.

We request that you respond to this letter by <u>Sept. 26 1983</u>, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to <u>Octobern</u>

If you have any questions, feel free to contact <u>Pace Detamen</u> at (616) 456-5071. Please address your response to the above address on this letter.

Sincerely,

HAZARDOUS WASTE DIVISION

Ronald C. Waybrant District Supervisor Startus = 0.

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSIO THOMAS J. ANDERSON E. R. CAROLLO JACOB A. HOEFER STEPHEN F. MONSMA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

### DEPARTMENT OF NATURAL RESOURCES

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 April 23, 1984

Mr. James Harrison Gold Shield Solvents 312 Ellsworth St., SW Grand Rapids, MI 49502

Detrex Chemical Industrie

RE: MID 091605972 020 966764

Dear Mr. Harrison:

On April 23, 1984, staff of the Hazardous Waste Division, Department of Natural Resources, conducted an investigation as an agent of U.S. EPA of your facility located at 312 Ellsworth Street in Grand Rapids, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in compliance with the transporter requirements of Subtitle C of RCRA.

If you have any questions regarding this matter please feel free to contact Dale DeKraker at the above number.

Sincerely,

Ronald C. Waybrant, Ph.D. District Supervisor

Hazardous Waste Division

RCW/DDK/mn

cc: EPA Region V (w/ enc.) HWD, Lansing (w/ enc.)

Enclosure

RCRA Inspection Report 19 10020906764

EPA Identification Number: M = 1			
Installation Name: DETREK CHE	mode Industries, In	te.	
Location Address: 312 ELLS	O SOLVANI - WUISTAN WORTH S.W		
City: CRANO RAPIDS	State: MIGHIBAN	1	
Date of inspection: 4-23-84	Time of inspection (from)	1:15 pm (to) a : 03P1	
Person(s) interviewed	Title	Telephone	
Mr JAMES HARRISON	BRANCH MANAGER	(616) X5X -9269	
Inspector(s)  Pare De Kearer	Agency/Title	Telephone (46) 456-507/	
PACE DE MAREK	MICHIGAN DNR		
Installation Activity (mark only one	box)	Inspection Form(s)	
Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265.1 and/or	A	
TT Treatment/Storage/Disposal (no ge	neration or Transportation)	A	
T Generation and Transportation		В, С	
☐ Generation only		В	
Transportation only	·	<u>©</u>	
TRANSPORTER ONLY F UKSIT. TSO INSPECT			
SUMMER.			

KC: EPA REGINZ HUD LANSING

Sec	tion A: SCOPE OF INSPECTION	YES NO NI Remarks
	Complete this inspection form for transporters of hazardous waste subject to 40 CFR 263.10.	
2.	Does the transporter transport hazardous waste into the U.S. from abroad?	Com <sup></sup>
3.	Does the transporter transport hazardous waste out from the U.S.?	
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container.	
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part 263, Subpart B)
1.	Are copies of completed manifests available for review and retained for three years. 263.22	
2.	Estimate the number of manifests for shipments completed during the part 6 months.	~ 90 ·
3.	Examine a representative number of manifests. Indicate number examined.	Nº 40
4.	Did transporter properly sign and date the manifests examined?	
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	
	If (5) is "no," skip 6 and 7.	
6.	Do any manifests indicate shipments delivered to other than an alternate facility?	
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	,



# GOLD SHIELD SOLVENTS

Division of Detrex Chemical Industries, Inc.

Phone 454-9269×454-0443 ///

MID020906764

September 29, 1982

Department of Natural Resources State Office Building 350 Ottawa N.W. Grand Rapids, MIchigan 49503

UCT 01 1982

DISTRICT 3 WATER OUALITY DIV.

Attention: John Bantjes

Water Quality Division

In response to your letter dated September 14, 1982 citing our violations of the requirements of subtitle C of RCRA, the following corrective steps have been taken:

- Affidavits of personnel training are now on file-Copies attached
- 2. Danger signs have been posted
- 3. Inspection Log has been established-sample page attached
- List of emergency equipment has been included in the contingency plan - Copy attached
- 5. Operating record has been established-Copy attached
- Signed copies of the two missing manifests from the TSDF are now in our possession

I hope this meets with your approval and if you have any questions, please do not hesitate to call.

Very truly yours,

James H. Harrison Branch Manager

GOLD SHIELD SOLVENTS

JHH/sb

xc. Autlewanes (zel L. B. CHERREY

STATE OF MICHIGAN



WILLIAM G. MILL!KEN, Governor

### DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, Michigan

September 14, 1982

Detrer Chemical

Mr. James Harrison, Branch Manager Gold Shield Solvents 312 Ellsworth Ave., S. W. Grand Rapids, Michigan 49503

#### Gentlemen:

NATURAL RESOURCES COMMISSION JACOB Á, HOEFER L T. JOHNSON

...... LAITALA

HILARY F. SNELL HARRY H. WHITELEY

JOAN L. WOLFE CHARLES G. YOUNGLOVE

> On September 7, 1982, staff of the Department of Natural Resources conducted an investigation of your facility located at 312 Ellsworth Ave., S. W., in Grand Rapids, Michigan to evaluate compliance of that facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. The completed RCRA inspection form is enclosed.

As a result of that investigation, staff of the Department of Natural Resources have determined that the facility is in violation of the requirements of subtitle C of RCRA. Specifically, staff found that:

- Personnel training records are not available as required in 40 CFR 265.16(d), (1), (2), (3) and (4).
- Danger signs are not posted at each entrance as required in 40 CFR 265.14(c).
- An inspection log is not kept as required in 40 CFR 265.15(d). 3)
- A list of emergency equipment at the facility and its location 4) and capability is not included in the contingency plan as required in 40 CFR 265.52(f).
- The operating record does not contain all information required 5) in 40 CFR 265.73(b).
- Exception reports were not submitted as required in 40 CRF 6) 262.42(b).

RECEIVED SEP 1 7 1982

Bywork.

ACT 64



B1026-1 1/79

Page 2 September 14, 1982 Gold Shield Solvents

We request that you respond to this letter by September 30, 1982, providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter please feel free to contact me at 616-456-6232.

Sincerely,

WATER QUALITY DIVISION

John Bantjes

Water Quality Specialist

JB/mn

Enclosure

cc: Al Howard, OHWM (w/copy of form)

EPA Region V (w/copy of form)

John Bohunsky, Water Quality Division

## RCRA Inspection Report

	EPA Identification Number: M 1 D	O Z O O O	6764
		SHIELD SOLVEHTS	
	page 4	SWORTH AVE C	
10	City: GRAND RAPIOS.	State: Michican	
	Date of inspection: 4-4-70	Time of inspection (from)	
	Person(s) interviewed	Title	Telephone
	LARRES HARRISON	BRANCH MANAGER	(616) 424-9269
60	Inspector(s)	Agency/Title MDNR	Tel ephone (623)
	Installation Activity (mark only one	box)	Inspection Form(s)
	Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265.1 and	A A
	I Treatment/Storage/Disposal (no gen	neration or Transportation)	A
	☐ Generation and Transportation		В, С
	☐ Generation only		В
	TT Transportation only		

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SEP 1 7 1982

ACT 64

#### INSPECTION FORM A

### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit appli</u>	catio	n process(es) (EPA Form 3510-3) Inspec	tion Form /	A section(s)
501	M	storage in containers		I
502	M	storage in tanks		J
TOT		treatment in tanks		J
504		storage in surface impoundment		K,F
T02		treatment in surface impoundment		K,F
D83	Partie Parties	disposal in surface impoundment		K,F
S03		storage in waste pile		l.
D81	A STATE OF THE PARTY OF THE PAR	disposal by land application		M,F
D80		disposal in landfill		N, F
т03	No. of Contrast of	treatment by incineration		0/P
. ТО4	M	treatment in devices other than tanks, impoundments, or incinerators	surface	Q
Other activities	) )			
GENERATOR	N M		APPENDIX	GN
TRANSPORTER	区区		APPENDIX	TR

- 3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

		and the state of t		MUANU.	⊇: \ranu	: 200 Subpart B)
			YES	NO	NI*	Remarks
*	Has bee	the Regional Administrator en notified regarding: 265.12				
	a.	Receipt of hazardous waste from a foreign source?	dheart malkingin yezh	griometrica sundagg		HOME RECENT
	b.	Facility expansion?	Probabilista pp	-massa-pype;	4	1011 C 11311 D
	C s	Change of owner or operator?	44 CV-1 windowsky		-	
2.	Gen	neral Waste Analysis: 265.13				The state of the s
	a.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	market in the second	eris Almaticology	**************************************	RECYCLE OFFICERION
	Ď.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	www.jc towy & Standard Variabasia	E/1007 Editors.		Mal Recycle
	€** *** **	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	Michiganya	and the second s	Anti-missional	M C
2.	Sec	curity - Do security measures include (if applicable) 265.14	. Я -			
	₫ ≈	24-Hour surveillance?	manufacture (All:	V		
	b.	or i. Artificial or natural barrier around facility?	1	эт областичнай	ку баманууч мунда	2 million and a constant
		ii. Controlled entry?	-1/_		ALL CONTRACTOR	LOCKIO PSGII DUGIC
	c.	Danger sign(s) at entrance?	~~~~		o-4755***	
4.	0wn	er or operator inspections: 265.15				
	à.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	<del>M</del>		Minimum va vaga vaga	

\*Not Inspected

			YES	NU	NI	Remarks
	has	es the owner or operator we an inspection schedule the facility?		<del></del>		WEERLY
	the	so, does the schedule address e inspection of the following ems:				•
	м 19 9 8	monitoring equipment?	<del>Pre-ressorta</del>	(Parish Valley and Alley And A		MONE OR SHIP
	11 a	safety and emergency equipment?	3	***************************************	TELEVISION, COTATIVAÇÃO	SC TORPHOLOGOGOGOGOGOGOGOGOGOGOGOGOGOGOGOGOGOGO
	4 de mar. 9 de m	security devices?	er-seronum.	TTORES AND ADMINISTRA	Made of the copy o	
	iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	por desirency,	EL THA POPP-VEEDING-COLO	так бұмында спанияну	Emmir nimespäckung ausgeste promotion hannen protestation bestellt eine state ausgeste des bei bei bei bei sen
	٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	S. Company	• min Nove name (% (1))	ENERGHANNA OPTO	
-	Vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	Marine Secretaria	***************************************	\$minklerri(Zymropopolisis)	
	d. Are ed	areas subject to spills inspect- daily when in use?	Total Management	- AVE WAS	National Photo in Colombia State of Sta	
	an	es the owner or operator maintain inspection log or summary of mer or operator inspections?	#cmacasoners	<u> </u>	SERVICE PROPERTY OF THE PROPER	
	f. Doe fol	es the inspection log contain the lowing information:				
	j.	the date and time of the inspection?	ETTENDE NET No TEAMAN	-		Section and the section of the secti
	e de la companya de l	the name of the inspector?	*******************************	*************************	emmontypolemne, spp.	
	يا يا يا يا يا يا يا يا يا يا يا يا يا ي	a notation of the observations made?	**************************************	danner man de de la constante	o innerella discommunicacion	
	iv.	the date and nature of any repairs or remedial actions?	частичноступф	OP-ODing rechnology	ennellend fleggener missenske	
5.		training records 65.16				
	a. Job	titles?	TORKS ASSESSMENT	<del></del>	2	PEROMEN FULL
	b. Job	descriptions?	*****************************		<u> </u>	KERT IN DETROIT

			آصه سطا	1167	14 T	KelldTKS
	C.	Description of training?	NA STANSON STANSON	- Minterbookska	- Mr. mas	
	d.	Records of training?	======================================	economic dingr		RECORDS IN DETREN
	€.	Did facility personnel receive the required training by 5-19-81?	MESST medistrating	Carolic Edge-Gan-1 Fgs.	10	
	f.	Do new personnel receive required training within six months?	сельных торгад	whereaply is biffilliable	millionermanen	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?			V	
· ·	reg	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7			
	à.	Special handling?	UPPDSsin willedna	точения стате	NPME (SSA) victum myyk	N (1)
	b.	No smoking signs?	all Vilous (exp.)	HOMEOCOCO I ANGLANGANG	ant/antalabethqu	
	C.	Separation and protection from ignition sources?	Финітнацар	indicated	стануст самили	

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

		intenance and Operation Facility: 265.31	YES	NΟ	S-range and section and sectio	Down party of
		Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	(i)	NV	1 2 20	Remarks .
2.	If hav	required, does the facility ve the following equipment: 265.32				· ·
	ð.	Internal communications or alarm systems?	system and an artist of the second	Marriddan anggyyggy	Maries Same any organization	
	b.	Telephone or 2-way radios at the scene of operations?	A. C.	Prilaritano na sergo	Similar announce pro-	TECE EMERGE
	C.	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	n dalaha crassa	SVSSTNI nondamogu,	15 Леммарица получ	
	Inc	dicate the volume of water and/or fo	am avai	lable	for fi	re control:
	AND THE PERSON NAMED OF	201118011 111111111111111111111111111111	· : i ( ;	<u>. ) ^                                  </u>	<u> </u>	SCYTCU
3.	Tes Eme	the same and the same are a	ومهور ودومت سيد موسيط سادة الأمسانة الماسانة	district processing A support the Observations of States		
		sting and Maintenance of ergency Equipment: 265.33				
	3.	Has the owner or operator established testing and maintenance or operator arintenance procedures for emergency equipment?	<u> </u>			Carre Contract
	a. b.	ergency Equipment: 265.33  Has the owner or operator established testing and maintenance procedures				Silve
4.	b. Has	Has the owner or operator established testing and maintenance procedures for emergency equipment?  Is emergency equipment maintained in operable	4			
4.	b. Has imm ala	Has the owner or operator established testing and maintenance procedures for emergency equipment?  Is emergency equipment maintained in operable condition?  s owner or operator provided mediate access to internal	and the same of th			
	b. Has immala Is for Has	Has the owner or operator established testing and maintenance procedures for emergency equipment?  Is emergency equipment maintained in operable condition?  s owner or operator provided mediate access to internal arms? (if needed) 265.34	and the same of th			

## Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

Does the Contingency Plan contain the following information: 265.52

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

EIRE DEPT

· •/

L SITE

		YES	NO	NI	Remarks	
Eme	ergency Coordinator 265.55				*	
à.	Is the facility Emergency Coordinator identified?	and the second second	T TO CANAL CANA	d) bell dis di Collèbi imp		<del>6-11</del>
b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	rich surviva	dalah miliane da tilangi.	Arman raph, monto		NASS-444-2-2-2-3
C:	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	and real property	, stor of transplantages,	имален стания.		LACTORISE GENERAL CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONT
E me	ergency Procedures 265.56					
at Cod	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency ocedures listed in 265.56?				NA NONT COC CO.	

					YES	N0	MI	Remarks		
s «4	Use	of	Manifest System	265.71				d)		
	đ.	pro pro (Pa the gen	s the facility fo cedures listed in cessing each mani rticularly sendin signed manifest erator within 30 ivery.)	\$265.71 for fest? g a copy of back to the	<u></u>	Westernoon and the second and the se	**************************************	### Office And Transfer Secure Secure And Angulary Company		
			records of past ained for 3 years						,	÷
2.	requ	uire	e owner or operat ments regarding m ancies? 265.72	anifest		PREASING THE SECOND STATES	1984-Millionalpa			eredett det d'enn symmet dat black for annel par grant et sold
of	017-S	ite	ole to owners or facilities that d waste from off-s	o not		· .				
3.	0pe	rati	ng Record 265.73	3						
	à.	mai rec	s the owner or op ntain an operatin ord as required i .73?	g	. <u>V</u>	alia de Autorophonography	18000ABAPUNINEN			
	b.	con:	s the operating r tain the followin ormation:							Methodoxia en en en en en en en en en en en en en
		e prompt é	The method(s) an of each waste's storage, or disprequired in 40 C Appendix I?	treatment, osal as	, contracting the second secon		***EPENEREM			
	;		The location and each hazardous w facility? (This should be crossto specific manife waste was accoby a manifest.)	aste within the information referenced fest number,	3	<u></u>				
*	*** † †	* *	A map or diagram cell or disposal							
		only								

			YES	NO	. W. 🛓	Ren	ıarks			
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	er-hills-stannag	· · · · · · · · · · · · · · · · · · ·	Энгейдегийн ай	<u> </u>			andress or opposite the second second second second second second second second second second second second se	
45 1	iv.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	Okorikish-salkanga	enticipo resistant de	Milare liya diyerdi,	erastro-reac		Popular programma de la composição de la composição de la composição de la composição de la composição d		<b>2000</b> k On Sakumu um an
	V.	Reports detailing all incidents that required implementation of the Contingency Plan?	NUMBER Service Association		dem Salamerrope, cale	, and the second		Northall (Nobella Ashibi en-jengan kali		DOBAN karandaran i A
١	۷i,	All closure and post closure costs as applicable?	NO SONONOSTINOS	MBCAT His inhasiyyi	ಪೂರ್ವಾಗಿ ಆರ್ಥನ್ ಕ	MKDASIMADA (m		e.	- The second second second second second second second second second second second second second second second	
Ava	ilab	ility of Records 265.74								
unde	er 4	facility records required O CFR Part 265 available for ion?	Annual Magazana.	WHITE AND AND AND AND AND AND AND AND AND AND	makemony days seems	prist Artifaction of States	The most length appearance in the residence date and	andra, zi selektroprensi si selektrolik di kerene di sepeki	nnaturi, vindetti säätettä säätetä käyteen kää Ajassiilija nansiitussii.	
ŧ*Unma	anif	ested Waste Reports 265.76								
à.	haz gen	the facility accepted any ardous waste from an off-site erator subject to 40 CFR 262.20 hout a manifest or or shipping er?	. Ann Sell Markel State (4)	and Someon war	wasse-waren	- The analysis of the analysis				
b.	of des	"a" is yes, provide the identity the source of the waste and a cription of the quantity, type, date received for each unmani-	85 PRO T-4 MAZZEL LAP 1	tan Till Stand Stand Stand Stand Stand	- Then a Salin a seri - Transmission constitution of the series of the s	MANUSE FOR WORLD SLEDVE.	270.000 to 10000 and to 1000 a			
		ted hazardous waste shipment.	Married FAST - woods and						E POOP MANEEL ALL LANGES	

4.

ter to the spherical distribution in

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

				Section G ·	LOSURE AND PO	ST CL	OSURE	(Par	√ Subpart G)
				•		YES	NO	NI	Remarks
æ	Clos	ure	26	5.112	·				
	ð.			acility closur		addissary.	ATTYS NALLOSS SIGNASIA.	ROW-BEET - 10 A Grand Company	d:
	b.	Doe	s the	plan identify	i.		4.		,
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	y year	1.		mum hazardous ory?	waste in-	- Lance	STORES OF STORES	-40° Gilyan-ya <b>ra</b> sanan	
	و شمه	٧.	esti	mated year of	closure?	-laterory grappy	1	Marie Marie Comp.	1000 6000000000000000000000000000000000
		٧.	sche	dule of closur	e activities?	4	more representation of the second particular	The des Juppy way markets	
	С.	Has	clos	ure begun?		PONETO BARBORA DO VIN		kalasamikilo wyzy sąpa,	
e	Post	-61	osure	265.118					
	a.	Is t	the p	ost-closure placetion?	an available	Birinkidan ayy.	Stranger and Novino	**************************************	<u> </u>
	b.	Doe:	s thi	s plan contain	<b>♦</b>				
		Ť.	moni	ription of groutoring activition	ındwater ies and	energy-months of		WCM on WCCCCO	
	* Free	*****	desc acti for	ription of main vities and fred	ntenance quencies				
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			BB.	facility monit	coring equip-				
	Ű *	1.	of p	, address, and erson or office ng post-closure	e to contact	Energy and the second s	and the second s	What femologisting	
	C.	Has	the	post-closure pe	eriod begun?	a non-growing species.		SERVE CONTROLLE	
	ď.	Is t esti	ihe w imate	ritten post-clo available? 2	osure cost 65.144	entice thinkness,	Continue vive	anners manacht lith	

<sup>\*</sup>A lies only to disposal facilities.

### Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		169 1	4CI	1/1 T	Kelliarks
1 .	Are containers in good condition? 265.171	MERCHANISM MATERIAL AND	SOUTH RESIDENCE TO SE	ellines I. himomyspeniage	
2.	Are containers compatible with waste in them? 265.172	Name of the second	in faatherstelle ook	PENTENDINGALING	
3.	Are containers managed to prevent leaks? 265.173	Lane.	s - gantismingstiff/200-	THE TO SHIEDWARDS	
4.	Are containers stored closed?	dilamana -	Trial Card dimension of the	~~~\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
5.	Are containers inspected weekly for leaks and defects.	so-re-scenaries a	enary eron	e State Wand Schausen	
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if	265.176			
	waste is ignitable or reactive).	- Монитейский е	tuessa Euseniitudanu tusi	SSSWIEm negMousip	MA-no rummagus
7.	Are incompatible wastes stored in separate containers? (If not, the provisions				
	of 40 CFR 265.17(b) apply). 265.177	, +0+52+006/8888880 at	tari <del>ya da</del>		M.A. DME TYPE WASIE
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N.A. ONE THE WASH

#### Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the . tank? 265.192 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 3. Do continuous feed systems have a waste-feed cutoff? 4. Are waste analyses done before the 265.193 tanks are used to store a substantially different waste than before? Are required daily and weekly inspections done? 265.194 6. Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 7. Are incompatible wastes 265.199 stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? Tank capacity: gallons Tank diameter: feet Distance of tank from property line (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

	•	YES	NO	NI	Remarks *
	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	ASCRIBE (SACRAGE)	militar Ziriğilə nyiniy	kki vodjokopholda	
2 *	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	engrades now same	ormosyp-inigensk lag	domosilis er wat cod	11 1) 13 d 2 ( 6 ) 19
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?	Section Control of the	an and the feature of the	emant i beliji jem dan sakebi n	ak maggay-ung akni gan kakki dalihir dakam kanjaan paggangan kaken dalih kanja pagga samaka dalih sake sa sake
1.	Are inspection procedures followed according to 265.403?		more programme and the	ቀ~-ቀስ ልላሙ የዚህም የተያል	
5.	Are the special requirements fulfilled for ignitable or reactive				

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

wastes? 265,405

Are incompatible wastes treated?

(If yes, 265.17(b) applies.) 265.406

S	e	ct	ì	on	Ą	Sc	ope
•	~~			162 1 4		100	~ L

1 6	Complete this Appendix hazardous waste that is	if the owner subsequently	or operator of a y shipped off-site	TSD facility also generates for treatment, storage,
	or disposal.	3 · · · · · · · · · · · · · · · · · · ·		ion of exement, sentage,

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

			YES	NO	NI	Remarks		-
(1)	Doe ava	s the operator have copies of the manifest ilable for review? 262.40	The state of the s	esperature in the second	in . MADINANI GAN-FE-ROZZERO.			
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.						
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				4.		
	ð.	Manifest document number?	-		· .			•
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	NAME OF THE PARTY		4		messession of digit, the messesses of a digital section of the sec	entropy of the second s
	C.	Name and EPA ID Number of Transporter(s)?		<b>Controlling</b>	**************************************			
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?			Walter and American			
	е.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?		militä VI kälvävättän pransi	a westernaken mengefejen			
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>.</u>			grave and the state of the stat	PLIGOTOLINASSI PEDEL NETVEN	
	9.	Required certification?			-		**************************************	
	h.	Required signatures?	1/		· · · · · · · · · · · · · · · · · · ·			
(4)	Rep	ortable exceptions 262.42						
	ā.	For manifests examined in (2) (except for enter the number of manifests for which th signed copy from the designated facility w ment.	e gene	rato	r has N	OT receive	ad a	
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26 tor.	numbe 2.42)	r fo to t	r which he Regi	the gener onal Admin	ator istra	· esse

Sect	tion C: PRE-TRANSPORT REQUIREMENTS (Part 262, file	part (	C) -			
yer e	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	YES	NO	NI	Remarks	
2.	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32		s <sub>em</sub> nianopimalik	School & Chantell Sch puller	*  * * * * * * * * * * * * * * * * * *	
3.	If required, are placards available to transporters of hazardous waste? 262.33	nessensiering	лишись (1887 ін 1874).	marropho solven mille	sertelikatikatikatikatikatikatikatikatikatikat	
4.	On-site accumulation of generated hazardous wast waste it generates either (A) in its storage fact with 40 CFR 262.34 [see 265.1(c)(7)]. Option B and containers. If the installation elects option Section D. If the installation elects option tions: See 40 CFR 262.34 January 11, 1982 Revi	ility restri	[265 cts chec	.l(b)] all ac k this	or (B) i cumulation box [√]	n accordance n to tanks and skip
	a. Is each container clearly marked with the start of accumulation date?	, enterprise de la constante d	ja een maja maja ja	makeri dan Mandistria		
	b. Have more than 90 days elapsed since the date inspected in (a)?	NAMES HEARING PLANTS	المنابعة والمنابعة و	· amenders i fin	MCPrime II.D have her provided to be responsed.	
	c. Do wastes remain in accumulation tanks for more than 90 days?	nganggapan san panga		h Albanii Sopel West	AMMicrosoftwa nama makhtu zisha kalipuni	
	d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	djermatik F SASI ar de S	4-140-000	;	p. community and color sections	grand og skiller i 1800 form de skillerskriver skiller skillerskriver og skillerskriver og skillerskriver og s
<u>Sec</u>	ction D: - RECORDKEEPING AND REPORTING (Part 262,	Subpai	rt D)		•	
1.	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	YES	NO	NI	Remar	'k s
Sec	ction E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	part E	)			
agentus as	Has the installation imported or exported Hazardous Waste? 262.50		- AND AND AND AND AND AND AND AND AND AND	myo a-sanipad	AND RESIDENCE AND ARRESTS STORY	
	(If answered Yes, complete the following as applicable.)					
	a. Exporting Hazardous waste; has a generator:					

			YES	N()	NI	Remarks	
E Brown	Notified the Administrator in writing?			Fib.223/897 t-austynnife gu	statenska accommon og gypty p		
	e pera Pera	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	ar in services	ANY TO THE SECOND SECON	ThireShoulders (s) (A		
	iii.	Met the Manifest requirements?	-cuto-e-maces	Alexander of Committee	Milmon Landillocar (MF)		
s	the g	rting Hazardous Waste; has penerator met the manifest prements?					

### Appendix TR

Seci	cion A: SCOPE:	YES	NO	NI	Remarks
en en en en en en en en en en en en en e	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	accounts a real real control of the	والتعارض المعارض المعا	descensive series	
2.	Does the transporter transport hazardous waste into the U.S. from abroad?	-dron come y two and production day.	makan kan menger	skin Konning progggy	
3.	Does the transporter transport hazardous waste out from the U.S.?	Ф.ЛайМасПатичуна	madena		
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	Management of suggrega	all to Special connection	Policul Birk Old James 1999	
Seci	cion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263,	Subp	eart B)
to the state of th	Are copies of <u>completed</u> manifests available for <u>review</u> and retained for three years. 263.22	y y gygyndamy y	anabhlhigen ur bronneg	One of Page-resoning a	
2.	Estimate the number of manifests for shipments completed during the past 6 months.	er en en en en en en en en en en en en en	Stagement stage of a great stage of the stag	A	_
3.	Examine a representative number of manifests. Indicate number examined.	n = #From Andrews (Control	<u> </u>	TVIEN-AARIN-SVEININININAARIN	
4.	Did transporter properly sign and date the manifests examined?	derministenskrippere	all made and the second second second second second second second second second second second second second se	MORNON PORTS NATION	
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	Petikhidologa	L	Port (2000), sill changes and	
	If (5) is "no," skip 6 and 7.	4 Nichmaldina da napronaci (as	en prosentaro.	494 Ministeracija	
6.	Do any manifests indicate shipments delivered to other than an alternate facility?	#HithElic\Prossurers	makiri Salak king papy ya	Addressing Rev. PLOSS	
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	IESZERTTS-Procincies	addinant cultural		

Remarks: Gold Stices Soucents 19 11 JENDOR DE
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